

## **GRADUATE CERTIFICATE IN NATURAL MEDICINE (CLINICAL PRACTICE)**

### **DRAFT OUTLINE**

#### ***Introduction***

The Level 7, 60 credit Graduate Certificate focuses on clinical practice and is offered part time over one year. This will enable new graduates to begin practice and at the same time formally participate in a process of mentoring by experienced practitioners. Participants who successfully complete the graduate certificate, will be able to cross credit the two courses towards the Graduate Diploma in Naturopathy and Herbal Medicine. This approach provides graduates with:

1. a professional development plan that results in a formal qualification;
2. full registration with Natural Medicine Registers (to be confirmed); and
3. the opportunity to establish personal networks with natural therapy practitioners.

Many graduates move immediately into private practice and this may mean they work in isolation. It is anticipated that this graduate certificate will be manageable within one academic year and will assist graduates in their development as natural therapy practitioners.

#### ***Target Groups***

New graduates from naturopathy and herbal medicine modalities and those who are seeking to move from provisional to full registration.

Natural Therapy Practitioners who wish to develop an evidence-based approach to their clinical practice may seek to cross credit the first course and enroll in Clinical Practice of Naturopathy and Herbal Medicine(B).

#### ***Purpose of the Programme***

The overarching purpose of the programme is to shift the emphasis to a more defined diagnostic base for decision making through:

- Providing a process of mentoring by experienced practitioners of natural medicine to new graduates.
- Providing peer support for natural medicine graduates during the first two years of employment.
- Providing graduates with the opportunity to further their knowledge and skills in order to broaden their scope of practice and to gain full registration with Natural Medicine Registers in New Zealand and Australia.
- Enhancing clinical practice in natural medicine by the inclusion of a more evidence-based approach.

#### ***Proposed Programme Structure (60 credits)***

The one semester equivalent Level 7 programme will be delivered part time over two semesters and participants will be required to complete the programme within three sequential semesters. The programme will include the following two courses, both of which are compulsory:

- Clinical Practice of Naturopathy and Herbal Medicine (A)
- Clinical Practice of Naturopathy and Herbal Medicine (B)

### **Graduate Profile**

1. Enhanced ability to analyse cases from an evidence-based and traditional approach and apply that analysis to treatment plans.
2. The ability to reflect on a cross section of cases to allow for mentor and peer input into the development of treatment objectives.
3. The knowledge, skills and experience to apply for full registration with Natural Medicine Registers in New Zealand and Australia.

### **Approach to Delivery**

A tutorial approach will be taken and a number of experienced practitioners will participate in the case based sessions.

### **Course Descriptors**

A first outline of the two courses are attached.

**COURSE TITLE:** Clinical Practice of Naturopathy and Herbal Medicine (A)

**CREDIT VALUE:** 30

**LEVEL:** 7

**TOTAL COURSE HOURS:** 300 hours

**SPECIAL NOTES:**

1. *Participants will work on increasingly complex cases given by the tutor as well as presenting cases from their own natural therapy practice..*

**Purpose**

To provide participants with mentoring and peer support in the development of successful clinical practice in natural medicine.

**Learning Outcomes**

Participants will be able to:

1. Analyse a range of cases according to selected criteria.
2. Develop a series of questions to enable in-depth investigation into a range of cases.
3. Develop and present treatment plans for a range of cases.
4. Manage a natural medicine practice effectively.

Summative assessments	Learning Outcomes Assessed	Weighting
Two case based assignments given		
Two case based assignments taken from participant's own practice		
Case presentation – one of the cases taken from participant's own practice		
Business Plan for a Natural Medicine Practice		

**Prescribed Texts (to be added)**

**Recommended Readings (to be added)**

<b>COURSE TITLE:</b>	<b>Clinical Practice of Naturopathy and Herbal Medicine (B)</b>
<b>CREDIT VALUE:</b>	30
<b>LEVEL:</b>	7
<b>PRE-REQUISITES:</b>	Clinical Practice of Naturopathy and Herbal Medicine (A)
<b>TOTAL COURSE HOURS:</b>	300

**SPECIAL NOTE:**

'Evidence-based medicine is the conscientious, explicit and judicious use of current best evidence in making decisions about the care of individual patients. The practice of evidence-based medicine means integrating individual clinical expertise with the best available external clinical evidence from systematic research. By individual clinical expertise we mean the proficiency and judgement that individual clinicians acquire through clinical experience and clinical practice.

Increased expertise is reflected in many ways, but especially in more effective and efficient diagnosis and in the more thoughtful identification and compassionate use of individual patients' predicaments, rights, and preferences in making clinical decisions about their care. By best available external clinical evidence we mean clinically relevant research, often from the basic sciences of medicine, but especially from patient-centred clinical research into the accuracy and precision of diagnostic tests (including the clinical examination), the power of prognostic markers, and the efficacy and safety of therapeutic, rehabilitative, and preventive regimens. External clinical evidence both invalidates previously accepted diagnostic tests and treatments and replaces them with new ones that are more powerful, more accurate, more efficacious, and safer.

Good doctors use both individual clinical expertise and the best available external evidence, and neither alone is enough. Without clinical expertise, practice risks becoming tyrannised by evidence, for even excellent external evidence may be inapplicable to or inappropriate for an individual patient. Without current best evidence, practice risks becoming rapidly out of date, to the detriment of patients.'

<http://www.cebm.net/>

**Authors:**

- David L. Sackett, Professor, NHS Research and Development Centre for Evidence-Based Medicine, Oxford.
- William M. C. Rosenberg, Clinical Tutor in Medicine, Nuffield Department of Clinical Medicine, Oxford.
- J. A. Muir Gray, Director of Research and Development, Anglia and Oxford Regional Health Authority, Milton Keynes
- R. Brian Haynes, Professor of Medicine and Clinical Epidemiology, McMaster University Hamilton, Canada
- W. Scott Richardson, Rochester, USA

## Purpose

To provide participants with the opportunity to develop an evidence-based approach to the clinical practice of natural medicine.

## Learning Outcomes

Participants will be able to:

1. Analyse a range of cases according to selected criteria.
2. Analyse cases and develop treatment plans utilising an evidence based approach integrated into a traditional framework.

Summative assessments	Learning Outcomes Assessed	Weighting
Two case based assignments given	1&2	40%
Two case based assignments taken from participant's own practice	1&2	40%
Case presentation – one of the cases taken from participant's own practice	1&2	20%

**Prescribed Texts (to be added)**

**Recommended Readings (to be added)**

## GRADUATE CERTIFICATE IN INTEGRATIVE MEDICINE

### DRAFT OUTLINE

#### **Introduction**

The Level 7, 60 credit Graduate Certificate, offered part time over one year, focuses on the development of integrative medicine. Participants are also required to complete a research project on some aspect of integrative medicine. Participants will complete two 30 credit courses from the proposed Graduate Diploma in Naturopathy and Herbal Medicine.

#### **Target Groups**

The programme is likely to be attractive to a range of health professionals who wish to explore integrative medicine including Natural Medicine Therapists, General Practitioners and Registered Nurses.

#### **Definition**

'Integrative medicine is a new term that emphasizes the combination of both conventional and alternative approaches to address the biological, psychological, social and spiritual aspects of health and illness. It emphasizes respect for the human capacity for healing, the importance of the relationship between the practitioner and the patient, a collaborative approach to patient care among practitioners, and the practice of conventional, complementary, and alternative health care that is evidence-based.'

(From the University of California School of Medicine)

Integrated medicine is also inclusive of the principle of patient centred medicine.

#### **Purpose of the programme**

To provide participants with the opportunity to explore integrative medicine on all levels, including the issues involved in working in an integrated environment and how integration fits into the overall national strategy for health care

#### **Proposed Programme Structure (60 credits)**

The programme will be delivered part time over two semesters. Participants will be required to complete the programme within three sequential semesters. The programme will include the following two courses, both of which are compulsory:

- Integrative Medicine
- Health Research Project

#### **Graduate Profile**

1. An understanding of the health sector through an exploration of the commonalities among the professions, as well as the distinctive characteristics of each, and the contribution of each to the healing process.
2. The ability to articulate the benefits that integration can bring to the health care sector locally, nationally and internationally.
3. Incorporate the principles of integration into a health care practice.
4. Select and apply relevant research methodologies to the health sector.

### **Approach to Delivery**

A tutorial approach will be taken and, where possible, health practitioners working within an integrated environment will be invited to discuss with course participants an integrative approach to health care. Key people involved in New Zealand health care policy will also be included in the programme's delivery.

The Health Research Project will focus on some aspect of integrative medicine which will be negotiated with the course coordinator and, where relevant, the appointed research supervisor.

### **Course Descriptors**

A first outline of the two courses that make up the Graduate Certificate in Integrative Medicine are attached.

**COURSE TITLE:** Integrative Medicine

**CREDIT VALUE:** 30

**LEVEL:** 7

**PRE-REQUISITES:**

**TOTAL COURSE HOURS:** 300

**SPECIAL NOTES:**

***Key people involved in New Zealand's health care policy will be invited to address course participants as well as health practitioners practising within an integrated environment.***

### **Purpose**

To provide participants with a framework to incorporate integrative medicine into a health care practice.

### **Learning Outcomes**

Participants will be able to:

1. Describe and analyse the history of medicine as it relates to:
  - a. How the philosophical framework has influenced the development of medical models.
  - b. The common principles underlying modern health care practices.
  - c. The divergence of the holistic and reductionist models.
2. Explore the similarities and differences between the CAM approach and the biomedical model.
3. Create a model for an integrative practice in Australasia that incorporates a range of characteristics and outcomes.
4. Evaluate the current health care systems in Australasia and apply integrative medicine solutions to at least two perceived issues.



<b>Summative assessments</b>	<b>Learning Outcomes Assessed</b>	<b>Weighting</b>
Essay	1	25%
Presentation/or participation in debate	2	25%
Assignment	3	25%
Essay	4	25%

**Prescribed Texts (to be added)**

**Recommended Readings (to be added)**

Released under the Official Information Act 1982

**COURSE TITLE:** Health Research Project

**CREDIT VALUE:** 30

**LEVEL:** 7

**PRE-REQUISITES:**

**TOTAL COURSE HOURS:** 300

**SPECIAL NOTES:**

***The course focuses on individual student proposals that are negotiated with either the Course Co-ordinator or the appointed research supervisor.***

***Those who are enrolled in the Graduate Certificate of Integrative Medicine will choose a topic related to some aspect of integrative medicine.***

### **Purpose**

To provide participants with the opportunity to:

- explore and/or revise research methodologies suitable for researching health issues, including research that seeks to find practical solutions to specific issues identified within health related organizations/practices;
- examine a range of publications available to health professionals for publishing purposes; and
- complete, and report, on a research project on a topic related to the health sector.

### **Learning Outcomes**

Participants will:

1. Have the ability to examine various social science research methodologies suitable for applied health research.
2. Evaluate health sector research to defined criteria
3. Carry out a research project within a supervised environment.
4. Articulate research findings to a group of health professionals.
5. From their research findings, prepare for publication an article suitable for an identified periodical.

### **Course Requirements**

**Research Proposal (20%)** – Participants will prepare a research proposal document to the terms and conditions set by the Course Coordinator and in association with the allocated research supervisor.

**Health Research Paper (80%)** – Participants will submit a detailed research paper to the agreed terms and conditions. This will include (but not be limited to) a detailed literature review, a comprehensive research design that covers data collection and analysis, a discussion of findings and conclusions, and recommendations for further research.

### **Course Delivery**

This is the final course of the programme being studied and participants will, during their previous course, receive information on the health research project. This will enable them to begin to identify and discuss with the Course Coordinator a suitable research topic.

The course will begin with formal sessions covering research methodology and research design. The remainder of the course will be self-study supervised by a supervisor with expertise in the topic. Participants will be in regular contact with their supervisor and timetabled tutorial type sessions will enable participants to discuss aspects of their research with class colleagues.

**Prescribed Texts (to be added)**

**Recommended Readings (to be added)**

## APPENDIX 4 STAKEHOLDER CONSULTATION AND SUPPORT

### Letters from:

NZ Society of Naturopaths Inc  
 Vice President, The South Pacific Association of Natural Therapists NZ (Inc)  
 Technical Manager, Pacific Health  
 Good Health Products (Lani Lopez, Naturopath)  
 Erik Bakker and Dr Kamal Karl, The Hawke's Bay Wellness Centre  
 Managing Director, Metagenics New Zealand Limited  
 Natural Health Advisor, Nutra Life Health and Fitness  
 General Manager, Thompson Nutrition Limited

### Iwi consultation including support letter from:

Teahou Luke, Tamaki Healthcare PHO and Auckland PHO

### Consultation Meetings

Meeting Notes – 28 January 2006  
 College Response to Feedback

Meeting Notes – 7 March 2006  
 College Response to Feedback

### Independent External Critique of Programme

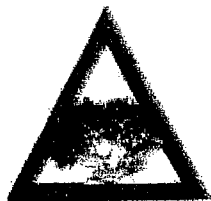
Dawne Sanson, Medical Herbalist, Member NZ Medical Herbalists Association

- Subject Expert Report
- Response to Independent Critique

Jill Dunn, Naturopath, Member NZ Society of Naturopaths Inc

- Subject Expert Report
- Response to Independent Critique

## Appendix 4a Letters of Support



**NZ SOCIETY of  
NATUROPATHS  
INC**

PO BOX 90-170 AUCKLAND

[www.naturopath.org.nz](http://www.naturopath.org.nz)

June 2005

To whom it may concern

I am writing to offer support for Wellpark College of Natural Therapies (Wellpark) application to provide a degree course for Naturopaths.

We see this as advantageous to the industry and a way to raise national standards and increase credibility and recognition for Naturopaths. Further Tertiary qualifications in Naturopathy could only be positive, as it would bring the profession up to a level similar to other allied health professionals.

Providing a degree course for Naturopaths would improve the service that Naturopaths can offer to their clients and go some way towards meeting the increased demands for the services of Naturopaths. A degree in Naturopathy suggests a more professional qualification.

The degree course currently being developed by Wellpark has obviously been well researched and planned. It is especially positive that the subjects that are intended are specific to NZ Naturopaths including Maori Health and the NZ Health Care System. It is also very positive that the degree course works in partnership with Auckland University, giving students access to facilities there, and also ensuring that courses are at a suitable level for a degree.

By developing this degree course the faculty at Wellpark recognises that education should be continually reviewed to ensure that it is relevant to the present and future of Naturopathic Therapies in NZ. Further, it is great that the new degree course will be available to new naturopathic students and also to practicing Naturopaths who have completed a diploma and want to upgrade their qualifications.

We wish the faculty at Wellpark well in this endeavour.

Yours Sincerely

Anna Juby  
Secretary  
On behalf of the NZ Society of Naturopaths Committee



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**The South Pacific  
Association of  
Natural Therapists NZ (Inc.)**

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NEW ZEALAND

www.spant.co.nz

*Degree*

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Devonport, Auckland 1309  
(09) 445 7885

June 7, 2005

Wellpark College of Natural Therapies  
Francis St  
Grey Lynn, Auckland

Dear whom it may concern,

On the 23rd of May 2005 a motion was raised and seconded by the SPANT committee in favour of supporting Wellpark College of Natural Therapies intention to upgrade the current and existing Naturopathy Diploma course to a Degree status.

This is something that the members of the SPANT committee wholeheartedly support as an important step forward for our industry. We believe the current diploma course being offered by Wellpark College is of a very high standard, though a degree course will see an enhanced improvement in learning opportunities for graduates of naturopathy. This will help assist our industry in many ways not least in achieving more recognition by other Health Professional's.

SPANT is the oldest established association for Naturopaths in New Zealand forming in 1940. We have a long and proud history where we ensure the public are protected from unqualified practitioners and that qualified practitioners are given deserved recognition.

Yours in health and wellness

Scott C. Smith ND MH  
Vice-President SPANT



20<sup>th</sup> June 2005

To whom it may concern,

Pacific Health would like to offer this letter of support to Wellpark College in their endeavors to create degree course in Naturopathy that we believe will benefit the entire natural health industry and ultimately help to transform the health and vitality of New Zealand.

Pacific Health Ltd. is one of the largest New Zealand companies to supply natural health professionals with an extensive range of products relating to a multiplicity of disciplines within the natural health industry.

We have a rapidly growing company and our main area of growth is relating to "practitioner only" health products, as the natural therapies industry is booming in New Zealand and has been for some time. In particular we cater to the supply needs of Naturopaths as well as many other allied health modalities.

We believe ***it is vitally important there is comprehensive and specific education and training unique to the growth area of Naturopathy.*** This is why Pacific Health Ltd. whole heartedly supports Wellpark College in the generation of a comprehensive degree course in naturopathy. Firstly because there is currently no degree course in naturopathy being offered in New Zealand and secondly because naturopathy is a unique field of study that cannot be adequately covered by other areas of education currently being used under the umbrella of "health sciences".

We are happy to support Wellpark Colleges' endeavors in this area in any way we can.

Yours sincerely

Vanessa Hitch Bsc(CompMed)  
Technical Manager  
Naturopath

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**Naturopath Lani Lopez BHSC, Adv Dip Nat**  
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Grey Lynn, Auckland  
email: info@wellpark.co.nz

May 4, 2005

To whom it may concern,

I am writing this letter in support of Wellpark College and their Naturopathic Degree proposal that they hope to be able to offer to their students next year.

The degree program can help prepare students for careers in professional areas related to naturopathy, literature, product development, health professional seminar lecturing, media, book writing, and many more opportunities related to health and the pursuit of natural medicine.

The credibility that the degree offers in the corporate world is immeasurable. In a time where the health system (both orthodox and natural) is heavily scrutinized, the degree offers a general amount of security to the media, public and also to health companies that employ natural health practitioners.

It ensures that the naturopath will have comprehensive knowledge of medical matters as well as a sturdy constitution for deadlines and commitments (as it often is when you study hard to obtain a degree). It is also extremely useful, especially when we have to be able to converse with the orthodox medical profession with credibility.


Nine years ago I was employed by Good Health as resident naturopath. I now hold the senior position for naturopaths out of a team of six, within our naturopath and marketing department at Good Health Products NZ. Good Health is a multi million dollar New Zealand owned company that manufactures health products, for national and worldwide retailers and health practitioners.

When choosing naturopath applicants we look at their qualifications among other things and five of our naturopaths have a Bachelor of Health Science degree. We have a biannual magazine which the naturopaths contribute to, design and edit to educate and create public awareness of health issues. We proudly acknowledge the naturopaths degrees (to retailers and public), which gives us the edge over our competitors as well as enhancing our reputation. Our naturopaths write in many well known magazines as well as being involved in the research and development of products, and offer a basic public service on the advice help line. I myself have had the confidence to write and publish two books, which came out of applying myself to the degree and appear as a health expert on TV and radio.

The degree also offers post grad opportunities to enhance the knowledge of health practitioners (marketing, economics, chemistry et al). Two of our naturopaths are taking this opportunity and being supported by Good Health to complete post grad papers.

I hope you will seriously consider my support of Wellpark's Naturopathic Degree proposal. They have an excellent reputation and produce wonderful practitioners. They could be viewed as an asset as they contribute to New Zealand's health system, economy and morale. A degree could only serve to enhance this.

Regards

  
Lani Lopez BHSc, Adv Dip Nat (Naturopath)

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**Eric Bakker** B.H.Sc (Comp.Med) ND RC Hom.

**The Hawke's Bay Wellness Centre**

New Zealand's *First* Medical Centre to offer full integration of conventional and natural medicine

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Napier  
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Dear Phil,

16 September 2003

Wellpark College of Natural Therapies in Auckland has become an important institution in New Zealand in terms of offering excellence in Natural Medicine study. Wellpark College currently offers Diploma level qualifications in Naturopathy; however, it would be most advantageous for the industry and future of Natural Medicine in New Zealand to finally offer the Degree level programmes in Auckland.

Currently, Naturopathic students are required to complete their Bachelor Degrees through Charles Sturt University in South Australia, after completion of the Diploma of Applied Science Naturopathic course at Wellpark College. Having this higher level Bachelor course available right here in Auckland, will elevate the professional level and credibility of Naturopaths both with the public as well as with the existing health-care system. Professional Naturopaths can help to strengthen the current emphasis on health promotion and disease prevention, and encourage greater individual awareness of the need for personal responsibility. This in turn will eventually amount to significant health-care cost savings.

The time has never been greater to embrace this model, as health services in New Zealand are stretched to their limit, many conventional health services are stressed and are often unable to provide the level of care they would prefer to offer their patients. This can be clearly seen as increasing numbers of New Zealanders are looking outside the current system for their health care needs, with increasing amounts turning to complementary medicine.

The time is right now to embrace the Degree program for Naturopaths based in New Zealand; it is time to give the professional more credibility, thereby helping to create a new model of natural health care in New Zealand to take us through the 21st century and beyond.

Yours truly,

Eric Bakker B.H.Sc (Comp. Med) ND, RC Hom.



Dr Kamal Karl MB.BS. FACNEM



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9 October 2003

**TO WHOM IT MAY CONCERN**

This letter goes out in support of the Bachelor of Health Science papers that are being written at Wellpark College specifically for Naturopathy.

There are a number of reasons why this course has a valuable place in the New Zealand health care arena. Firstly it will endeavour to provide a high standard of training in Naturopathy, Herbal Medicine and specifically related areas, which are rapidly becoming recognised as a valid health-care options for the greater community. By working toward this higher standard of education specifically for Naturopathy, a new industry standard is established. The issues of industry training standards are being constantly up-graded and addressed with the event of the Health Practitioners Competency Assurance Bill, which is currently being developed before parliament, and with this the inevitable registration of practitioners that will be required. In effect, this paper is working toward the recognition of Natural Medicines being recognised and validated to be integrated into the existing medical model.

There are a growing number of areas where this degree of qualification will be sought after standard, from companies who require medically trained technical support to their customers, through to the standard of practitioner required for safe private clinical practice, competent in the areas of treatment and appropriate referral.

Points of value I see in these papers specifically are that the papers build on scientific medical knowledge and advancements in orthodox and naturopathic research, as well as encompassing traditional naturopathic philosophy.

I see that the development of this Bachelor of Health Science, specifically for Naturopathy, shows foresight and vision in the industry of Natural Health Care and Medicines.

Yours Sincerely

Olly Nyberg  
Managing Director.



HEALTH &amp; FITNESS

7 June 2005

To whom it may concern,

As a prior student of Wellpark College of Natural Therapies, I am currently employed as a Naturopath for Nutra-Life Health & Fitness. So on behalf of the complementary health industry, it gives me great pleasure to have the opportunity to support the vision of Wellpark College on their proposal to introduce a Naturopathic Degree Programme.

Understanding complementary medicine is a comprehensive science. It involves many long hours of commitment and dedication to a Diploma curriculum involving a detailed knowledge of how the body works, pathological processes and how to treat people holistically.

Wellpark has always placed an emphasis on preparing Naturopathic students to become successful health practitioners through its extensive clinical training and research opportunities. Clinical training functions primarily like a medical internship and is fully supervised by tutors who themselves have a wealth of knowledge and experience in the natural therapies arena. In my experience, this has been the most pivotal part of the Naturopathic Diploma programme, where one can begin to put theory into practice.

My role as a Naturopath involves providing technical advice, writing material for health publications, developing a Continuing Education Programme and being part of our innovative product development team, involving formulation input. Having now worked in a role that deals very closely with public health issues, it is becoming very apparent that the way of the future is for more research-based emphasis, which requires more intensive training. Naturally, the complementary health industry is faced with finding suitably qualified staff, with the appropriate training, technical background, skills and understanding to meet the requirements of the marketplace. Consumers are becoming more discerning with regard to the use of natural therapies and dietary supplementation. They now have much greater access to information via the internet, however, not all sources give reliable information. Hence there is a need for properly qualified people, who can keep abreast of research advancement, in order to be able to inform consumers accurately and help minimise confusion.

With the upskilling of qualifications from a Naturopathic Diploma to Naturopathic Degree status, Wellpark College offers a tremendous and much needed opportunity to fulfil the technical and research-based requirements that the industry demands. It will also allow the complementary health arena to become more aligned with the medical profession.

There is definitely a great need for a Naturopathic Degree Programme. It will allow complementary medicine to be more readily recognised and accepted by the medical profession.

Every endeavour should be made to ensure that this Degree Programme comes to fruition, so that natural therapies can attain its rightly deserved place in the welfare of our community.

Yours sincerely

Ingrid Pilz  
NATURAL HEALTH ADVISOR

Nutra-Life Health & Fitness is a 100% privately owned New Zealand natural health company and major supplier to the nutritional products market, both in New Zealand and overseas. Nutra-Life is proactive in promoting the message of positive health and performance through better nutrition, providing ongoing information, innovation and support to its customers and distribution partners. This support also includes product innovation through constant research, ensuring Nutra-Life is at the cutting edge of international trends in the markets in which it competes.

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Mr. P. Dowling  
Wellpark College of Natural Therapies  
PO Box 78-229  
Grey Lynn  
Auckland

**To whom it may concern**

This letter is to place on record industry support for a natural health degree based in New Zealand.

While the existing qualifications in are a useful grounding in Naturopathy, we need to formalize and extend this training to give legitimacy to complementary medicine in this country.

In the past, our industry has been open to criticism regarding the lack of scientific rigor in this discipline. We are pleased to report that this has now changed with a wealth of valid research (much of it double-blind and placebo controlled) having been completed in the field of natural medicine.

Never has there been a better time to acknowledge this paradigm change in natural medicine through a degree course.

It also seems inappropriate that New Zealand students wishing to legitimize their career in complementary medicine must do so via an Australian based degree, which, by its very nature, has been developed from an Australian perspective.

Significantly, the presence of a degree in natural medicine in Australia has resulted in a more researched based philosophy throughout the industry, meaning services and products available across the Tasman are held in higher regard.

Industry in New Zealand requires a benchmark for both students to aspire to, and companies to judge competence in the field of natural medicine.

Furthermore, with the imminence of Trans-Tasman harmonization regulations (June 2006), which will transfer dietary supplements from the food category to medicine



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Web: www.thompsons.co.nz

status, there is no question that the industry will need a higher level of expertise to meet these legislative demands.

In conclusion, we fully support a move to a New Zealand based complementary medicine qualification at degree level.

Yours faithfully

A. J. Baker  
General Manager  
Thompson Nutrition Limited

Released under the Official Information Act 1982

## Appendix 4b Iwi Consultation

Initial discussion with Maori Naturopathy graduates of the College indicated that the following areas should be included in the degree development:

- Traditional Maori Health – its characteristics
- Knowledge and use of native herbs
- The sustainability of herbs
- Cultural safety

The programme has been developed to include the above and the various requirements of the relevant professional bodies and the document is now being sent out to seek support and feedback from the key stakeholders.

Attached is an outline of the programme aims, values, scope of practice, and graduate profile, together with a list of the courses that make up the programme – relevant courses are highlighted. The following is an outline of course content that relates to the areas listed above:

### **Year 1 Semester 1 – Foundations of Naturopathic Practice(1)**

The purpose of the course includes introducing students to ‘a range of traditional naturopathic therapies ...’ One of the learning outcomes is the identification of the ‘philosophies of a cross section of natural health therapies currently practiced in Aotearoa New Zealand’. The students will be introduced to Traditional Maori Healing (nature and characteristics). Guest speakers cover these areas and the purpose is to give students an awareness of the different approaches so that as practitioners they will be able to refer clients appropriately.

### **Year 2 Semester 1 – Herbal Materia Medica**

From a range of 42 native herbs, there is a requirement for a minimum of 11 specified native herbs to be studied in depth. The following learning outcome is also included:

*Students will be able to identify issues related to bioavailability and biodiversity with plant medicines worldwide but with specific reference to native plants, rongoaa and tangata whenua.*

### **Year 2 Semester 2 – Health in the Context of Aotearoa New Zealand**

This course is to be offered through Auckland University of Technology (subject to final approval). The purpose of the course is to enable students to critically enquire into and reflect on, the socio-political context of Aotearoa / New Zealand and how it relates to health and professional practice and development. Relevant learning outcomes are:

- Demonstrate an understanding of social and political structures and beliefs within Aotearoa/New Zealand.

- Analyse beliefs, values and theories regarding health and health care provision.
- Demonstrate an understanding of Te Tiriti O Waitangi.
- Demonstrate the ability to value diverse perspectives in a variety of situations while interacting in partnership with colleagues and clients.

### **Year 3 Semester 1 – Applied Therapeutics for Naturopathy and Herbal Medicine 2**

Within the framework of increasing the scope and deepening the student's understanding of the role of herbal medicine in the treatment of a range of health disorders, a learning outcome is included so that students will be able to:

*Follow kawa in relation to the gathering, preparation and dispensing of native plants in Aotearoa.*

### **Year 3 Semester 1 – Health Research**

A further course that students will take through the Auckland University of Technology (subject to final approval). The course introduces students 'to a variety of research approaches applicable to practice in the health environment.' The relevant content areas covered are:

- *Ethical, social, cultural and political contexts of research;*
- *Kaupapa Maori research*

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part?

# Tamaki Healthcare



Primary Health Organisation

22 Burleigh Street  
Grafton  
PO Box 8139  
Symonds Street  
Auckland

Telephone: 09 307 0516  
Facsimile: 09 307 0192

**TO WHOM IT MAY CONCERN**

24.04.06

I am writing in support of Wellpark College's proposed provision of the following degree programme:

*Bachelor of Naturopathy and Herbal Medicine*

I have read the relevant curriculum material and wish to make the following comments in support of the initiative:

- The programme has included four components that are important to iwi:
  1. The characteristics of Traditional Maori Health
  2. The knowledge and use of native herbs
  3. The sustainability of native herbs
  4. Cultural safety
- The programme reflects national and international trends through the expansion of the natural health therapy industry.
- The programme supports the direction of the New Zealand Health Strategy, eg one specified outcome of the Strategy is the orientation of complementary and alternative health care towards a holistic approach to health. The Strategy also emphasizes support for consumers making lifestyle changes. These are key components of the proposed programme.
- I am aware that the College has successfully offered diploma programmes in these areas for some time now and I believe the move towards enabling students to become degree qualified practitioners will be increasingly important as the Health Strategy is implemented.

I wish the management and teaching staff of Wellpark College well with this initiative.

Mauri ora  
Yours in health

Teahou Luke  
Health Promotion Project Manager  
Tamaki Healthcare PHO & Auckland PHO



## Appendix 4c Consultation Meetings

### NOTES OF CONSULTATION MEETING FOR THE PROPOSED BACHELOR OF NATUROPATHY AND HERBAL MEDICINE

#### External Participants:

Maria Middlestead, ND, Dip Clinical Nutrition, Nutrition Practitioner (30 years), author, part time educator

Linda Bailey, ND, Adv Dip Nursing, Naturopathic Practitioner and supervisor of clinical students

Phil Rasmussen, MSc (Pharmacology), dip Herbal Medicine, Medical Herbalist, Phytomed herbal extracts for practitioners

Richard Aylett, ND, BHSc, MHSc, Iridology and Naturopathic Practitioner

Jill Dunn, ND, BHSc, MHSc, Naturopathic Practitioner and Herbalist

#### Internal Participants:

Phillip Cottingham, Principal

Jenny Cottingham, Assistant Principal

Philip Dowling, Head of Faculty, Naturopathy, Herbal Medicine and Nutrition

Dr Sridhar Maddela, Head of Faculty, Medical Sciences

Dr Vijay Srinivasamurthy, Head of Faculty, Ayurvedic Medicine and Yoga

Phillip Cottingham outlined the major reasons for degree development:

1. There is a need for a degree in the discipline that is relevant to the New Zealand situation. The only degree programme available in Auckland adds Health Science courses from Charles Sturt University in NSW.
2. The development of the Health Practitioners Competency Assurance Bill will lead towards setting standards for registration of practitioners. An under graduate degree is likely to be the minimum required standard as in other health related areas. Australia is moving rapidly towards a Bachelors degree for registration.
3. The public perception of health practitioners relates to level of qualification.
4. The trend towards integrated medicine (mainstream/natural) and the need for this to be a key component of any degree programme.

It was noted that currently there are excellent opportunities for NT graduates and a Bachelors degree is essential.

*Trends/Programme requirements* – External participants commented.

Patients are now consulting with both medical and complementary medicine practitioners. Often these are medical specialists rather than GPs - a growing trend. There is a disproportionate amount of negative press on NT which is picked up by the public and they go to GPs and/or the pharmacy. *There is a need to build bridges between College and specialists so that there is a greater understanding of the contribution of NT practitioners to medicine and an awareness of the level of science underpinning the qualification. Students need an understanding of the interface and referral protocols. They also need to have some interaction with the medical profession during training.*

November 2007

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The medical profession is beginning to make a move into the NT area. Suggested there was a risk of the NT profession gradually dissipating and becoming marginalized. *A full qualification path is required in NZ in the longer term.*

The future will be integrated medicine. *Students need to graduate with more confidence in the market place and this requires greater understanding of orthodox medicine and pharmacy and how they integrate.*

There is a need for greater understanding of safety pertaining to the tools of the trade, including improved knowledge of drugs and herbal medicine and their interaction. There is a need for increased knowledge of serious illnesses which require more training in pathology and diagnosis.

Some doctors are [slowly] including Naturopathy into their practices.

Graduates from all Colleges are limited in their knowledge of disease except what they learn in Pathology. This is holding back integration. The system is currently disjointed and students need exposure to a wide range of clinical presentation. *A way needs to be found to link students with the wider health system especially hospitals. Suggested that Year 1 students could get some exposure to the system and clients through involvement in rest homes – this could be an assignment looking at life stories. There is a team of doctors that are linked with the mobile clinic and this approach could be used to allow students greater exposure.*

Because students are passionate about NT, they like to begin helping people as quickly as they can. In some ways the current programme is supportive of that even before students have gained a well rounded understanding of what they are doing. They then become confused and this leads to a lack of confidence in practice. *The proposed programme needs to provide focused training (theory and practice) to enable them to use NT applications properly. The approach to teaching needs to be seriously considered to ensure students gain confidence in practice. The curriculum needs to be developed so that students understand that their practice is based on a sound body of knowledge. It may be that consideration needs to be given to how students are inducted into the profession from initial interview through to graduation as confident primary health care professionals.*

Noted that there are two models where there is integration (Chinese and Ayurvedic) and both have embraced research.

The importance of students looking at the limitations of NT was noted. Often they are taught the limitations of orthodox medicine but not the limitations of what they are studying.

The profession is held back by the lack of academic researchers in New Zealand. Creating a sound under graduate programme that prepares students for post-graduate work will assist the development of NZ research in NT.

Approaches in the current Diploma programme that need attention in the degree programme were outlined:

1. There is a need for more rigour in assessment and in delivery methods. There needs to be a conscious approach to teaching and developing critical thinking. Students must be prepared to be confident and thinking practitioners who could continue with research and post-graduate study. *This will require leadership from the Heads of Faculty as the degree is implemented. It was agreed that this area would be looked at in relation to the 2006 academic year. Students need to be prepared to take their place in the profession.*
2. Library facilities and resources. These are essential and development is required.

Philip Dowling outlined the current Diploma and the proposed Bachelor of Naturopathy and Herbal Medicine, the credit system, the graduate profile and overall outcomes for each of the four years of study.

External participants noted that the strength of the approach at Wellpark is the application of knowledge to self. This is an educative process both personally and professionally.

It was identified that as some areas will be dropped to enable depth in other knowledge areas, the College should look at graduate qualifications for practitioners who wish to study a different modality; Ayurveda was an example.

Suggested that time allocation for pathology was too light and that there needs to be more practical work in year 2. It was suggested that it may be able to be taught differently and this needs further consideration. Reference was made to a greater emphasis on differential diagnosis.

Year 2 is more applied and requires the students to make sense of the knowledge they have gained in year 1. It is important that a problem solving approach is progressively taken throughout the programme. Key to year 2 is learning diagnostic skills.

It was suggested that the university course in year 2 could be in pathophysiology. This would link theory and practice. Noted that AU has a specimen library which would be of value to students.

There was caution against teaching a whole range of diagnostic skills in a short period of time when there are key diagnostic skills that primary health care practitioners need to master if they are to be confident practitioners. It was suggested that it is not necessary to include the specialist skills.

A key component is coming to a decision on the balance between orthodox and other diagnostic skills. This is a philosophical decision and will require debate.

The services of Medlab could be drawn on as students will use their services in the future.

#### *Summary feedback from external participants*

- The programme is an important development so that students do not need to go off shore for an NT degree. A NZ focus is essential.
- Without a sound academic base through degree and post-graduate programmes, the profession will die.

- Important to get the correct balance: science/traditions of NT/advances in the profession.
- Difficult to get the curriculum right for the future market place and there will need to be constant reassessment and improvement in consultation with the profession.
- Strength is the immediate practical and hands on approach based on sound theory, whereas some other programmes have two years of theory before application.
- Supportive of including hydrotherapy into the programme.
- Maintain the NT philosophy and keep to what is done best without introducing too much time into modern medicine.

A further meeting with the external advisory group will be held within the next six weeks. Wednesday was preferred.

Grace Sylvester  
26 January 2006

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**RESPONSE TO CONSULTATION MEETING FOR THE  
BACHELOR OF NATUROPATHY AND HERBAL MEDICINE  
HELD ON 26 JANUARY 2006**

*Need for the College to build bridges to enable GPs/specialists to gain an increased understanding of the contribution of NT:* The Head of Faculty (NT) has initiated a Breakfast Club for Natural Therapists and participation will be extended to medical practitioners interested in Natural Therapy.

The College will make a formal invitation to the Integrated Medicine Association with a view to discussion on the degree development.

*Students need an understanding of the interface and referral protocols:* This will be addressed in Foundations of Naturopathic Practice(1) and will include guest speakers.

*Students need to graduate with greater confidence to practice:* The programme provides extensive experience within the College's dispensary and clinic. The proposed 4<sup>th</sup> year which has a strong internship approach will meet this need. Consideration is being given to providing a more formalized mentoring approach to bridge graduates into practice.

The clinical component has been arranged so that year 2 students have more exposure through sitting in on some year 3 student clinics in preparation for the final year's study.

*Linking students with the wider health system:* This will be discussed through the consultation process with medical practitioners. Year 1 students will be encouraged to take up various opportunities on a voluntary basis, including participation in the mobile clinic.

*Safety which includes improved knowledge of the interaction drugs/herbal medicine:* Covered now in year 2 and year 3 (Clinical Practice). However, safety requires more emphasis and a particular focus in diagnostics.

*Student awareness of the limitations of natural therapy:* This is covered in:

- Year 1 - Foundations of Naturopathic Practice(1)
- Year 2 – Introduction to Clinical Practice
- Year 3 – Amplified further in Clinical Practice for Naturopaths

The topic will be within the Scope of Practice which is yet to be developed in association with the professional bodies. Similarly, *Ethics* is covered at each stage.

*Time allocation for Pathology:* The Heads of Faculty agreed that while 140 hours face to face teaching is higher than any other institution offering similar programmes, pathology will be integrated into the diagnosis courses.

Before implementing the degree, a Professional Development programme will be put in place for all staff in relation to delivery of degree programmes. Topics will include teaching for critical thinking and appropriate approaches to assessment.

*Library Facilities and related resources:* A review of the library is to be undertaken and a development plan put in place.

*Suggested a greater emphasis on differential diagnosis:* The proposed curriculum has been adjusted and this is now covered in Applied Medical Science for Natural Therapies(1).

*Suggested it is unnecessary to include the specialist skills:* Agreed that students will be made aware of the specialist skills but the focus will be on the key diagnostic skills that the students will use in practice.

*Balance between orthodox and other diagnostic skills:* It was agreed that the balance between orthodox and other diagnostic skills proposed for the degree curriculum is adequate. The only change has been a redesign of the Year 2 diagnostic course to ensure that students gain a deeper knowledge in terms of the orthodox medical diagnostic skills. Currently students are learning a little about a wide range of orthodox diagnostic skills and the proposed curriculum will focus on the key skills.

Grace Sylvester  
2 February 2006

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**NOTES OF CONSULTATION MEETING (2) FOR THE PROPOSED  
BACHELOR OF NATUROPATHY AND HERBAL MEDICINE**

**7 March 2006**

*External Participants:*

- Dr Mimi Irwin, General Practitioner, Mt Eden
- Vanessa Hitch, Naturopath, representing the natural therapies industry
- Monika Vadai, Naturopath, representing the professional body (SPANT)
- Dawne Sanson, Naturopath and Herbalist, NZAMH committee member
- Jan Aubrey, Homeopath and part time lecturer
- Ingrid Pilz, Naturopath, representing the natural therapies industry

*Wellpark College staff in attendance:*

- Phillip Cottingham, Principal
- Phil Dowling, Head of Faculty, Naturopathy, Herbal Medicine and Nutrition
- Dr Sridhar Maddela, Head of Faculty, Medical Sciences and Yoga
- Kerry Atma, Student Administrator
- Grace Sylvester, Curriculum Consultant (Chair)

Phillip Cottingham outlined Wellpark's present, and proposed future, role in natural therapies education. In summary, he referred to the importance of evidence based medicine in an integrated health environment but stressed that this direction must not be at the cost of traditional values, beliefs and philosophies.

The participants were invited to respond to the following two questions:

- What are the *trends* you have noted in natural therapy over recent years? And
- What are your *predictions* for the future in relation to the broad field of health care that may impact on Wellpark graduates and their preparation for practice?

The following emerged:

The trend towards *evidence based medicine* and the growth of clinical trials of natural products funded by commercial organisations. This was acknowledged by a number of participants but the associated risk was also identified, eg the push for evidence based medicine is the 'edge' where traditional philosophies may start to crumble. The commercial drive is very strong.

An added risk is that information/results are disseminated, picked up but not used in an holistic manner.

One Australian outcome of the push towards evidence based medicine, especially in natural supplements, is that in order to be listed, products must have 'evidence' resulting from clinical trials.

Kerry Atma introduced the idea that there are new research paradigms that should be incorporated into the research course.

There was general support for the importance of evidence based medicine and the inclusion of this aspect into the degree curriculum with the proviso outlined above.

Participants indicated that students need to understand and value the importance of evidence based medicine but that they need to graduate with a clear understanding of the point at which the practice of the core values of traditional medicine must take priority.

It was suggested that there should be more emphasis on *research, particularly reading, understanding and challenging research than on actually carrying out research.*

*Career options* It was noted that these have expanded considerably over recent years and the expansion of natural therapists within the corporate world is likely to create further opportunities for graduates. Employee stress has become a legislated responsibility for employers and there is a trend towards natural therapy in the work force.

Strong support was given to the *degree development* as it is seen as becoming the base requirement for future practitioners. Those with a degree qualification will not only have standing in the arena of orthodox medicine, but will have the knowledge and skills to apply that learning in an increasingly complex health environment.

Members of the associations present confirmed that a degree will be the level for practitioner registration in the future as is now the case in Australia. Brief discussion took place on the proposed 4<sup>th</sup> year that the College intends to develop – possibly a Graduate Diploma.

The general issue of *unsafe practitioners* in the community was raised by one of the participants. Discussion took place on the importance of practitioners succeeding in qualifications that required in-depth study such as the proposed degree. The importance of a New Zealand registration process was also emphasised.

Phillip Cottingham presented the previously distributed document covering the draft *aim, philosophy, core competencies, scope of practice and overall graduate profile.*

*Core competencies* - It was suggested that bio-chemistry should be included in the core competencies. It is already in the programme but as it is not included in the NIMH(UK) core competencies, it should be included with the competencies.

*Scope of Practice* - The College intends for the scope of practice to be sent to all relevant professional associations for comment.

There was discussion about whether there should be a length of time indicated for the suggested limited scope of practice for new graduates. Mention was made of the requirement for most professions to remain up-to-date through ongoing formalized learning. It is anticipated that this will become a requirement as the profession moves towards registration in the natural therapies. Dr Irwin outlined the requirement for GPs to participate in monthly peer review groups where cases are brought and discussed. *The time aspect was not resolved and it is suggested that this should be raised with the associations when the scope of practice is circulated for ratification.*

Discussion took place on the areas that graduates have not been trained to treat and raised the need for post-graduate courses of study to be developed to enable the scope of practice to be expanded. Dr Irwin suggested that, in these situations, students should be encouraged to write letters to the client's GP. This will improve the standing of the profession, create links across the approaches to health care, and increase practitioner safety.

*Graduate Profile* – Dr Irwin would like to see the reference to research in the graduate profile strengthened. The suggestion was to add something along the lines of: *'... including the ability to assess evidence through critiquing scientific papers.'*

The area of clinical attachments was raised. This does not occur as it has not been possible to get the cooperation of the practitioners. Students carry out clinical work in the College's Clinic and are required to complete 350 hours of clinical work, including 25 clients.

There was discussion around the use of the term 'diagnose' in the profile and it was agreed that this should be altered to *Differentially diagnose.*



There was strong support for the integrative approach to health care as outlined in the aim. There was a question as to how much can be achieved within the three year time frame. The proposed 4<sup>th</sup> year of study when graduates will be working in the field and studying part time was seen as the most appropriate time for addressing the *application* of natural therapies in an integrated health care environment.

*General Comments* – One participant questioned the development team over whether the amount of work was manageable in the time frame. Participants who had graduated from the current 3 year diploma noted that the proposed degree is much more connected and less disjointed. They believe this will assist students to manage the workload. They also noted the importance of students becoming self-directed in their approach to learning; noting that this is a requirement for a successful practitioner.

Wellpark staff responded that the move to 4 courses/semester and less summative assessment events through an integrated approach to assessment will ensure that the programme is manageable. It is proposed to expand the time allocated to *Learning to Learn* so that time management, study habits and academic writing are included.

The participants were strongly supportive of the design of the degree and of its approach for the changing field of health care. They were all supportive of the direction the College is taking.

Grace Sylvester  
7 March 2006

Released under the Official Information Act 1982

**RESPONSE TO CONSULTATING MEETING FOR THE  
BACHELOR OF NATUROPATHY AND HERBAL MEDICINE  
HELD ON 7 MARCH 2006**

The following points were raised during the second external consultation process (see meeting notes). The College's response is set out below each point:

*Evidence based medicine and traditional philosophies*

An evidence based approach is identified in the proposed graduate profile and this will be progressively developed throughout the programme through class discussion on appropriate references and readings. This will provide students with a base when they reach the final semester of the programme and study the course *Evidence based practice for Natural Therapies* at Level 6 which in many ways is the capstone course. The course's proposed purpose statement is:

*To equip the student to include applicable research findings in the formulating of treatment plans and to be able to utilize that evidence base in a variety of ways and settings to enhance their practice of natural medicine.*

In response to the associated risk in relation to the possible undermining of traditional philosophies, the core values of traditional medicine underpin the programme and are taught throughout beginning in the first semester with *Foundations of Naturopathic Practice*.

*Greater emphasis on research, particularly reading, understanding, challenging (necessary for issues around clinical trials as raised at the meeting) as well as an understanding of appropriate research paradigms for natural therapy research.*

Response as for evidence based medicine above together with the introduction of a 15 credit Level 6 research course in the final year of the programme. Research will be a key focus of the proposed 4<sup>th</sup> year programme for graduates.

Graduate profile – A new bullet point will be inserted after 'Contribute to the field of naturopathy and herbal medicine ...' to read:

*Assess evidence through critiquing scientific papers.*

*Career options*

There will be a section on career opportunities in the programme document as well as on the College's website. It is noted that the supplement industry is one of the fastest growing industries in New Zealand. Increasing numbers of Wellpark graduates are taking up employment in the supplements industry. Staff in the industry currently contact senior Wellpark staff for suitable graduates.

*Core competencies*

Bio-chemistry is in the proposed programme in the courses *Applied Aspects of Nutrition and Naturopathy (1) and (2)* and covers the knowledge that is required in a modern day naturopathic and herbal practice. It is anticipated that bio-chemistry will be expanded further in the proposed 4<sup>th</sup> year programme. Bio-chemistry has been added separately into the identified core competencies as this component is not highlighted in the NIMH core competencies.

*Scope of Practice*

This has been sent to the following associations for ratification:

- SPANT
- NZAMH
- Society of Naturopaths
- Accreditation Board
- The Charter

The issue of setting a time frame for a limited scope of practice for new graduates was not resolved and the above associations have been asked for their views.

*Referrals to GPs* – This has now been included in *Introduction to Clinical Practice*.

*Clinical Attachments*

Students are required to spend 15 hours observing on the mobile unit and a further 15 hours observing clinical work prior to engaging in supervised clinical practice with 25 clients. It is not possible to extend the 'clinical attachment' requirement without the commitment of qualified naturopaths and financial support through government funding.

*Use of term 'Diagnose'* – replaced with 'Differentially diagnose' as suggested.

Grace Sylvester

## Appendix 4d Independent Subject Expert Evaluations

### Independent Subject Expert/Practitioner Evaluation 1

Please complete this form electronically and send it to:

*Date?*

academicdirector@wellpark.co.nz

#### Details:

Organisation Name: Wellpark College of Natural Therapies  
 Programme: Bachelor of Naturopathy and Herbal Medicine  
 Date of Report: 6 May 2006  
 Subject Area: Herbal Medicine  
 Name of Subject Expert: Ms Dawn Sanson

#### **Brief summary of subject expert's qualifications and/or experience in relation to the subject area:**

Diploma in Natural Therapeutics (SPCNT) 1985  
 Diploma in Herbal Medicine (SPCNT) 1989  
 BAppSci(Health) Massey University 2001  
 PGDip (Social Anthropology) Massey University 2002

Private practice as a naturopath, medical herbalist and remedial body therapist for over 20 years

Member of SPANT

Member of NZAMH; on the committee for 4 years, 2 of those as President, now serving as Convenor of Education sub-committee.

#### **General Comments on the Programme:**

This is a very full course with an enormous amount of material compressed into three years. Because of the nature of the course, i.e. a combination of Naturopathy and Herbal Medicine, along with its emphasis on evidence- and research-based criteria I have some concerns that it is a little too academically oriented rather than clinically based.

I wonder if the AUT paper Health Context in Aotearoa is really necessary – I understand its importance in terms of students gaining a broader health context (and I did a number of similar papers as part of my Massey degree) but it does take up a lot of credits in what is already a tight programme. The cultural aspects could be covered in a smaller timeframe within existing papers; skills such as academic essay writing, critical reflection and problem solving can be, or are already, covered in other papers. This then would 'free up' a number of credits which could go towards more clinically relevant topics.

November 2007

*electronic submission*

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I would like to have seen more credits given to Materia Medica but, on the other hand, I suspect the students will be spending many more than 150 hours on this paper! Likewise for Herbal Therapeutics.

A combined course such as this does pose challenges for NZAMH as we analyse the programme to ensure there is sufficient herbal medicine content, e.g. another concern is around the clinics and the weighting given to the prescribing of herbal medicine preparations rather than (albeit probably entirely appropriate) naturopathic remedies. The question is raised yet again about what are the differences between a naturopath and a medical herbalist? NZAMH addressed this issue in its HPCAA submission by saying there are many similarities but that medical herbalists have a greater emphasis on the use of herbal medicines whereas naturopaths may be more eclectic.

***The programme aim is clearly defined and appropriate for the qualification's outcomes.***

The programme aims are appropriate.

Perhaps 'variety of settings' could be expanded a little, e.g. clinical, education, research, advisory role to manufacturers or government policy, etc.

***The graduate profile is consistent with the overall programme aim.***

Yes.

I wonder if the word 'holistic' can be included somewhere (perhaps in the Scope of Practice)? The profile, scope and core competencies are consistent with those identified and drawn up by NZAMH.

***The programme as a whole is coherent with appropriate level and progression of knowledge/practice within the various subject areas, particularly herbal medicine.***

Yes the programme follows a logical and sequential progression from theoretical knowledge, to the application of this knowledge, to analysis of cases and treatment in a clinical setting.

***The credit value assigned to individual courses is appropriate, particularly in those related to medical herbalism.***

As mentioned above, I would like to see a few more credits for Materia Medica and/or Herbal Therapeutics.

***The assessment of specific courses, particularly in medical herbalism, is appropriate to meet the purpose statement of the course.***

Yes the assessments address Learning Outcomes and use a variety of assessment tools, including practical assessment in areas such as dispensing of herbal formulae.

***The programme meets the requirements for an entry level Medical Herbalist.***

In my personal opinion this is the case, subject to some reservations as outlined above.

***The graduates would have the necessary skills and knowledge to gain admission to the New Zealand Association of Medical Herbalists.***

I will need other members of the NZAMH Education committee to look at the proposed programme, but this is the outcome which I will recommend to the committee.

Dawne Sanson  
NZAMH Education sub-committee

*Dawne?*

Thank for your time.

## RESPONSE TO INDEPENDENT CRITIQUE

### MS DAWNE SANSON, MEDICAL HERBALIST

The following response relates to specific questions/areas of concern raised by the Independent Subject Expert. Comment is not made on the areas where clearly NZQA standards have been met.

#### **General Comments on the Programme**

*Quantity of material* - It is acknowledged that the programme is demanding in the amount of material required to be covered in three years' full-time study. The College expects students to manage the workload and experience has shown that they do. The workload is not significantly different from the current programme and it is the minimum required to be a practitioner in this field.

*Too academically oriented rather than clinically based* - Most of the third year is dedicated to clinical training. The first two years are dedicated to building up knowledge for the third year. The approach to teaching requires students to start thinking as practitioners from the first module, eg as new knowledge is presented its application to practice is highlighted and, as appropriate, demonstrated. [The requirement for tutors to be current practitioners is a key component to the success of this approach.]

The College sees the proposed Bachelor of Naturopathy and Herbal Medicine as a basis for practice and not a replacement for a good professional development programme. The College is aware of the need for graduates to have ongoing clinical development as well as the ability to integrate research into their practice. Consequently a graduate diploma is being developed to accommodate these needs.

A requirement for degree approval is that graduates have the requisite theoretical base to enter post-graduate study. It is believed that for students to practice effectively in the changing world of natural medicine, graduates also need an understanding of evidence based practice. It is believed that the proposed degree meets both these important aspects.

*Outcome:* The College believes that there is sufficient balance of theory and the application of that theory to practice.

*Inclusion of the AUT paper Health in the Context of Aotearoa New Zealand* – The cultural aspect is covered thoroughly in this course, it broadens the students' understanding of the health sector, and is one of the College's strategies for collaboration as required by the TEC.

*Outcome:* Include the AUT paper.

November 2007

*updated  
reworded*

*Preference for more credits given to Materia Medica and Herbal Therapeutics – A check has been made against the NZAMH requirements and the proposed degree has exceeded those requirements in each curriculum area. Materia Medica is learned more in the application than in the theory. Consequently the learning occurs in the three Applied Therapeutics courses as well as in clinical. Herbal therapeutics is the major therapy around which the students base their clinical cases. Outcome: No change.*

*Concern around the weighting given to prescribing herbal medicine – Agreed. Outcome: A change has been made to the clinical training course. Students will now need to prescribe herbal medicine in at least 80 per cent of their cases.*

*Expand the phrase 'variety of settings' in the programme aim - Agreed. Outcome: Alteration made.*

*Suggested 'holistic' be included – Agreed. Outcome: Included in graduate profile.*

Released under the Official Information Act 1982

## Independent Subject Expert/Practitioner Evaluation 2

Please complete this form electronically and send it to:

[academicdirector@wellpark.co.nz](mailto:academicdirector@wellpark.co.nz)

### Details:

Organisation Name: Wellpark College of Natural Therapies  
 Programme: Bachelor of Naturopathy and Herbal Medicine  
 Date of Report: 3<sup>rd</sup> May 2006  
 Subject Area: Naturopathy  
 Name of Subject Expert: Ms Jill Dunn

### **Brief summary of subject expert's qualifications and/or experience in relation to the subject area:**

- MHS<sub>c</sub> Complementary medicine, Reg. Naturopath (SN), Reg. Medical herbalist (NZAMH)
- Taught both nutrition and herbal medicine to naturopathic students since 1987
- Worked in commercial arena as naturopath since 1987
- Naturopathic practice since 1985
- Chairperson, Advisory Group, Herbal Medicine Unit Standards
- Member, Advisory Group, Naturopathy Unit Standards

### **General Comments on the Programme:**

- The programme appears to be delivered in an integrated manner with knowledge of orthodox and natural treatments, providing a basis for integrated healthcare in N.Z.
- Introduces research methodology and critique which will encourage complementary medicine research within N.Z. in future. This will address a current weakness in complementary medicine in N.Z.
- An applicable undergraduate degree that examines health in the context of N.Z. Currently undergraduate degrees are only available off shore and do not relate to healthcare in N.Z.



**The programme aim is clearly defined and appropriate for the qualification's outcomes.**

Agree.

**The graduate profile is consistent with the overall programme aim.**

Yes, although the "Scope of Practice" which applies for the first 2 years following graduation is not realistic. Giardiasis, hepatitis A, B, & C, measles, mumps, rubella, pertussis, lead poisoning and chemical poisoning are all notifiable diseases/conditions that are commonly encountered in CAM practice. I would like to see the following amendments:

1. **Any notifiable disease (except supportive treatment) when the patient is also under medical treatment**
2. **Malignancies – confined to supportive lifestyle, dietary and herbal treatment.**

**The programme as a whole is coherent with appropriate level and progression of knowledge/practice within the various subject areas, particularly naturopathy.**

I have been unable to find where the basics of the following modalities are taught. The naturopathic advisory group considered these fundamental to naturopathic practice:

- Lymphatic drainage
- Bach flowers – Is this covered in depth in "Foundations of Naturopathic Practice 1" or is this a brief overview?
- Cell salts – Are these covered under homeopathy or nutrition?
- Allergies – no evidence that this is included in nutrition programme
- Haemaview
- Reflexology

Haemaview is mentioned in "Applied medical science for Natural therapies 1" but I could not find where initial basic knowledge was gained prior to application. Reflexology and lymphatic drainage have been identified under "scope of practice" but have not been included in programme.

I would also like to see nutrition added to herbal medicine and homeopathy in the management of disease in "Applied therapeutics for naturopathy and herbal medicine 1 and 2.

**Foundational Sciences for Herbalism** (also applies to nutrition) which should be reflected in the title.

**Applied Nutrition and naturopathy 1** – Learning outcome 2; range needs to include macro and micro minerals. Learning outcome 3 – antioxidant range should also include carotenoids, flavonoids, Co enzyme Q10, lipoic acid.

I am unsure to what extent orthodox medications are included in medical conditions covered in learning outcome 4 & 5. I think commonly used medications should be added to learning outcome 4 for all the diseases covered and then in learning outcome 5 the pharmacology and pharmacodynamics etc. for the listed drugs be covered.

Drug interactions with herbs, supplements and foods should be included as well as the benefits of including certain nutrients and herbs with drugs to decrease their adverse effects.

**Applied Nutrition and Naturopathy 2** – Respiratory and musculoskeletal systems have not been included in the range for learning outcomes 1 & 2.

**Applied Medical Science for Natural Therapies 1** – should also include Foundations of Naturopathic Practice 2 under prerequisites as iridology is applied here and requires basic knowledge on iridology provided in this module.

**Applied Therapeutics for Naturopathy and Herbal medicine 1** – applies herbal medicine in the treatment of conditions when Herbal Materia medica the foundational knowledge of herbs has not been completed.

I presume differential diagnosis is taught somewhere in the programme but this was not immediately obvious.

***The credit value assigned to individual courses is appropriate, particularly in those related to naturopathy.***

The credits for the bodywork component have not taken into account lymphatic drainage. Allergies should be identified in nutrition component and drug-nutrient and drug-food interactions and drug-nutrient benefits added to nutrition component. Otherwise credits assigned are satisfactory for required knowledge for naturopathic practice. This naturopathic course is very strong in herbal medicine.

***The assessment of specific courses, particularly in naturopathy, is appropriate to meet the purpose statement of the course.***

The assessment of modules is satisfactory except for the following:

- “Clinical practice for naturopaths and medical herbalists” paper requires some refinement based on advisory group recommendations. I would suggest 20 clients (and not 22) are required to demonstrate effective case management skills and 5 (not 3) clients to have 3 follow up sessions. These 5 clients should have health problems that are related to different body systems eg. Respiratory, reproductive, gastro-intestinal, endocrine, nervous system etc. which would provide broader depth of knowledge (as opposed to all gastrointestinal disorders).
- Herbal Materia medica – Formative assessment. I am unsure if this refers to students preparing a herbal action file, if so I think it should be removed as it is extremely time consuming without the development of critical thinking. Currently this has been replaced with another assignment that integrates knowledge on pharmacology and energetics of herbs. Phil Dowling has spoken to Phil Cottingham about this.

***The programme meets the requirements for an entry level Naturopath.***

This programme starts from entry level and there is progressive development of knowledge and application.

***The graduates would have the necessary skills and knowledge to gain admission to the relevant professional associations.***

With the addition of the lymphatic drainage, Bach flowers, allergies, cell salts (these maybe included but weren't obvious) this programme provides adequate knowledge for naturopathic practice and covers areas identified by advisory group as essential knowledge for a naturopath. Based on this graduates should have the necessary skills to gain admission to naturopathic professional associations.

Thank for your time

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## RESPONSE TO INDEPENDENT CRITIQUE

### MS JILL DUNN (NATUROPATHY)

**The Graduate Profile** - suggested amendments in relation to notifiable diseases.

*Outcome: The suggested amendments have not been made for the following reasons:*

- *The College believes that 'supportive treatment' is not treating the disease. It is therefore essential that a clear statement is made that Naturopaths and Medical Herbalists do not treat notifiable diseases as there are legal implications.*
- *The Scope of Practice includes lifestyle and dietary issues but the College believes that adding herbal treatment opens the way for problems relating to the interaction between herbs and the treatment for malignancy that is being given. While experienced Naturopaths and Medical Herbalists may work in this manner, it is inappropriate for new graduates to be working in this way.*

**Inclusion of Lymphatic Drainage** – It is considered that Lymphatic Drainage is integral to Body Therapies but not integral to Naturopathy. To practice this technique requires a number of hours of instruction and practice and the College believes it is not desirable to include a small amount of time on the subject. Students are free to take up appropriate courses from the Massage curriculum should they wish. It is understood that skill in Lymphatic Drainage is not a requirement for membership of the relevant professional associations.

**Bach Flowers** – It is believed that the allocation is sufficient for inclusion of this therapy within a naturopathic practice. A brief overview is provided.

**Cell Salts** – these are covered under homeopathy and, under the content section of *Foundations of Homeopathic Practice*, the following has been added: 'Cell Salts as an adjunct to homeopathy.'

**Allergies** – these are covered in *Applied Nutrition and Naturopathy (2)* and has now been added to the content section as a separate topic: *Allergies (in relation to disorders)*.

**Foundational knowledge for Haemaview and Reflexology** – The underpinning theory for these two assessment tools are presented during the course titled *Applied Medical Science for Natural Therapies(2)*. Consequently both are specifically included in the course content section. The application of theory is assessed through practical assessments #3 and #4.

**Suggestion that Nutrition is added to Applied therapeutics for Naturopathy and Herbal Medicine(1) and (2) in relation to the management of disease** – Nutrition Therapeutics is covered under Applied Nutrition and Naturopathy. *Outcome: No change.*

**Add Nutrition into the course title – currently Foundational Sciences for Herbalism.**  
 Agreed. *Outcome: Course title changed to Foundational Sciences for Herbalism and Nutrition.*

**Applied Nutrition and Naturopathy (1)**

- Suggested changes to learning outcomes 2 and 3 have been made.
- Orthodox medications are not covered at all in this course but covered in *Applied Medical Science for Natural Therapies (1) and (2)*. The essential pre-requisite knowledge is covered in Year 2 within *Applied Medical Science for Natural Therapies (2)* and applied in Year 3 within *Applied Therapeutics for Naturopathy and Herbal Medicine(3)*.
- *Drug interactions with herbs etc.* – This aspect is covered in year 3 within *Applied Therapeutics for Naturopathy and Herbal Medicine(3)* under learning outcome #1.

**Inclusion of respiratory and musculoskeletal systems in Applied Nutrition and Naturopathy 2.** Agreed and include within the range in learning outcomes 1 and 2.

**Suggested pre-requisite for Applied Medical Science for Natural Therapies(1) to cover the application of Iridology.** Agreed and pre-requisite added.

**Applied therapeutics for Naturopathy and Herbal Medicine(1)** – issue around applying herbal medicine when Herbal Materia Medica the foundational knowledge, has not been completed. *Outcome: Materia Medica runs over a full year and Herbal Therapeutics needs to be delivered in Year 2 to prepare students properly for clinical practice. This issue will be overcome through teaching the key herbs before covering Herbal Therapeutics.*

**The teaching of differential diagnosis is not immediately obvious.** Agreed. *Outcome: Included in the list relating to each condition.*

**Drug nutrient and and drug-food interactions/benefits to be added to nutrition component.** – This is covered in *Applied Therapeutics for Naturopathy and Herbal Medicine 3* and listed under Content.

**Reference to the proposed programme being strong in herbal medicine** – the College has noted and is pleased with this comment because of the increasing integration between Naturopathy and Herbal Medicine. The proposed degree programme addresses the knowledge and skills required for a Naturopath to practice herbal medicine effectively and safely. The programme addresses a long standing issue amongst Medical Herbalists relating to Naturopaths practising herbal medicine.

**Reference to assessment in two specific courses:**

1. **Clinical Practice** – Agree with suggestions and changes made accordingly.

2. **Herbal Materia Medica** – Agreed and this formative assessment removed. The assessment that integrates knowledge on pharmacology and energetics of herbs is the first summative assessment on the schedule.

**Other possible errors** – Agreed and these have been corrected.

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## **Appendix 4e. Letters of Support for Revised Application**

*Two associations have been sent copies of the application. We are awaiting letters of support, which we plan to have ready for the panel at the time of their visit.*

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## Appendix 5. Discussions with External Academic Institutions

Initially the College was engaged in a lengthy process with Auckland University of Technology (AUT).

Further to the panel's report, discussions have been held with Auckland University of Technology (AUT) – Health Science Department. An Memorandum of Understanding has been drafted and forwarded to AUT. The process of agreement has been slow, and is still being considered but AUT. Because of the “capped environment” that now exists for all TEI's they are having difficulty finding places for our students in the selected courses. Following this decision from AUT, the Principal approached the Osteopathy division of the School of Health Sciences, Unitec about the possibility of them delivering a section of the programme (three courses). The response has so far been positive.

There will be a meeting on 28<sup>th</sup> November 2007, to discuss and possibly finalise arrangements. Information will be available to the panel regarding the outcome of these discussions. Progress reports will be furnished to Lesley Edgely-Page on a regular basis prior to the panel convening.

*The following MOU document has been drafted and submitted to Unitec for comment.*

### Proposed MOU Between

**Wellpark College of Natural Therapies Ltd. – The Principal Provider (The College)**

**And**

**Unitec Institute of Technology – The Subcontractor (Unitec)**

### Purpose

- 1 The purpose of this Memorandum of Understanding is to develop a relationship of mutual benefit between Unitec and The College
- 2 The Memorandum establishes and provides for a clear understanding of the basis and ongoing conduct of the relationship between Unitec and The College in the context of the Education Act and other statutory and regulatory obligations of the College in relation to delivering tertiary education in New Zealand (namely its relationship with the Tertiary Education Commission and The New Zealand Qualification's Authority).
- 3 Both parties acknowledge the Treaty of Waitangi/Te Tiriti o Waitangi (“the Treaty”) as the founding constitutional document of New Zealand.

### The Parties

- 4 Unitec Institute of Technology – which is a tertiary institute constituted under the Education Act 1989 Part 14.
- 5 Wellpark College of Natural Therapies is a registered Private Training Establishment delivering tertiary courses in Natural Therapies over a wide range of modalities.



6. Wellpark College (or more properly the owner the Prema Trust) has an MOU pending with Ngati Whatua Nga Rima o Kaipara, as manawhenua within its own rohe, is a collective forum from the whanau, hapu and five marae communities: Reweti, Haranui, Kakanui, Araparera and Puatahi. Together they hold the rangatiratanga (customary authority) and kaitiakitanga (guardianship) over their own rohe with respect to any issue which may impact upon Ngati Whatua. Any MOU arrangements would have to ensure that the relationship between Ngati Whatua and the Prema Trust is not compromised.

### Goals and Objectives

7. To cooperate in the delivery of the Bachelor of Naturopathy programme offered at the College.
- 7.1 Unitec will undertake to deliver selected courses from the health science curriculum (osteopathy) in a subcontracting role
- 7.2 The College will cross-credit those papers into its Bachelor of Naturopathy programme.
- 7.3 Unitec will agree that the College can utilise the course descriptors of the Unitec papers in its revised application to NZQA for approval of the Bachelor of Naturopathy.

### Principles for the Relationship

8. The guiding principles of the Treaty of Waitangi are not contravened by any clauses in this MOU.
9. This MOU does not compromise any agreement with Ngati Whatua Nga Rima O Kaipara that either institution may have in place now or in the future.
10. This agreement will be in place for a minimum term of 6 years, with the right of renewal for another 6 years or by negotiation at a later date.
11. Ownership of the programme: The Bachelor of Naturopathy will be owned by Wellpark College of Natural Therapies

### Quality Assurance and Enhancement

12. Students enrolled in the programmes will agree to abide by the Quality Management Systems, rules and regulations and codes of ethics and practice of the institution delivering that section of the programme, regardless of the institution they have enrolled in. The following specific areas related to this will apply:
- Approvals and ongoing requirements for maintaining approval
  - Complaints, appeals and assessment procedures
  - Processes for course review and changes
  - Course documentation
  - External and internal moderation and monitoring
  - Internal and external auditing
13. Unitec and the College agree to share evidence and information regarding internal and external moderation processes and outcomes, quality management systems and auditing, and monitoring agreements, processes and outcomes.

### Learner Entry & Support

November 2007

14. All advertising for the programmes will be the responsibility of the College. Both parties agree to promote post-graduate programmes run by each other.
15. Entry criteria into the Bachelor of Naturopathy programme will be as per the College's Quality management System and programme regulations.
16. Students enrolling in the Bachelor of Naturopathy programme, will enroll through The College, with Unitec contracting to deliver selected portions of the programme.
17. The College agree to ensure that prospective students and students enrolling are presented with all the relevant information from both institutions.
18. Students enrolled in the Bachelor of Naturopathy will be entitled to student services (including library) offered by Unitec for the duration of their enrolment, provided that they enroll in one of the course papers offered by Unitec within that calendar year.
19. Student complaints, grievances and appeals will be dealt with under the systems of the respective institution delivering that section of the programme(s) related to the complaint, grievance or appeal. The results of the process will be conveyed to the institution under which the student is enrolled provided the principles and processes of the Privacy Act are followed.
20. The culturally specific needs of students and staff will be met by the institution delivering that section of the programme. Both institutions agree to share information on policies and processes in place to ensure that students are well informed prior to entry.
21. Both parties agree to have Health and Safety requirements in place and that these will apply to students whilst attending the respective institution.
22. If the arrangement terminates, both parties agree that students enrolled need to have the following:
  - a. Fee protection provided through approved fee protection arrangements
  - b. A plan in place to continue to deliver the education promised under the initial enrolment of that student unless this situation has arisen through financial inability to continue the programme

#### **Programme delivery, Assessment and Reporting**

23. Both parties agree to share curriculum documentation around the sections of the programmes that are delivered to students within the common programmes.
24. Both parties agree to ensure that programme documentation meets the minimum requirements of the other institution. This will enable students to cross-credit from one section of the programme to another at the other institution.
25. Both parties agree to deliver their sections of the programmes at an approved delivery site.
26. Both parties agree to ensure that their sections of the programmes are resourced appropriately and to share information regarding such to the other party.
27. Both parties agree that staffing of the programmes will meet the academic requirements of the programmes.
28. Both parties agree to allocate resources to the programmes, financial, physical (teaching space, classroom resources, student resources) and administrative support, that enable efficient and effective delivery of the programmes.

#### **Financial Arrangements**

29. The College agrees to pay Unitec a fee per student not greater than their current fee schedule for the course(s) delivered plus a payment equivalent to the EFTS funding per student for the particular course delivered to students enrolled at Unitec.
30. The College agrees to pay Unitec the amount (calculated under clause 29 above) within 38 days of the student being enrolled.

*not pay by Unitec see clause*

**Review of Arrangements**

- 30. The arrangements detailed under this agreement will be reviewed on an annual basis through a meeting of authorised representatives of both parties.
- 31. If a conflict or difference of opinion arises the following procedure will be utilised to resolve the issue(s):
  - a. A meeting of authorised representatives of both parties will attempt to resolve the issue(s)
  - b. If the issue(s) cannot be resolved an independent facilitator will be appointed, at the agreement of both parties
  - c. The decision of the independent facilitator will be binding on both parties
- 32. If the agreement is terminated the individual party's fee protection arrangements will be binding on that party.
- 33. Both parties will agree to support students through the process to ensure that ongoing education can be offered.
- 34. If the arrangements listed under this agreement become inactive for more than two years, this agreement may be terminated by either party.
- 35. This agreement runs for six years with the right of renewal for another six years if both parties agree.
- 36. If either party wishes to amend this agreement, they will approach the other party and enter into discussion with a view to amending the agreement. If there is no consensus, the original agreement will stand.

**Implementation of Relationship**

- 37 While the framework for the proposed relationship between Unitec and The College has been set out above, it is important that the process of meeting and working together commence in order to further shape the content of the relationship in operation.

**Agreement**

- 38 This Memorandum is freely entered into by both parties in a spirit of goodwill and in accordance with the goals and objectives set out above. The parties recognise the benefits of the Memorandum to themselves, to the development of further collaborative possibilities between the two institutions, the development of Complementary & Alternative Medicine in New Zealand and to the benefit of students. The Memorandum is a statement of intention.

For Unitec Institute of Technology

Signature \_\_\_\_\_  
 Name \_\_\_\_\_  
 Designation \_\_\_\_\_

For Wellpark College of Natural Therapies Ltd.

Signature \_\_\_\_\_  
 Name \_\_\_\_\_  
 Designation \_\_\_\_\_

**Appendix 6 Curriculum Vitae for Dr. Pauline McCabe**

CURRICULUM VITAE

OF

DR PAULINE JOAN McCABE

Released under the Official Information Act 1982

March 2007

**Name:** Pauline Joan McCabe

**Business address:** Complementary Care Education  
P.O. Box 74, Briar Hill, Vic. Australia 3088

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2. [pauline.mccabe@rmit.edu.au](mailto:pauline.mccabe@rmit.edu.au)

**Private address:** 27 Graeme Avenue, Montmorency, Victoria 3094, Australia

### QUALIFICATIONS

Certificate of Nursing (1969)  
Diploma of Acupuncture (1974)  
Diploma of Naturopathy (1977)  
Certificate of Midwifery (1979)  
Master of Primary Health Care (1995)  
Doctor of Philosophy (2001)  
Certificate of Aromatherapy (2003)

### CURRENT EMPLOYMENT

1. RMIT University, School of Health Sciences (Complementary Medicine): Program and course development and design with Prof. Marc Cohen (Master of Applied Science, Wellness).
2. Consultant, Complementary Care Education.

### SUMMARY

Dr Pauline McCabe has over 30 years experience in health care. She practiced as a nurse, midwife and naturopath, and later developed an academic career. She was appointed as Senior Lecturer in Naturopathy by the School of Nursing and Midwifery at La Trobe University in 1999 on the basis of her many years' experience as a nurse-naturopath, involvement with the integration of complementary therapies into nursing practice, and contribution to the advancement of naturopathic education into the public tertiary system. She later moved to the School of Public Health to take up a research position. Dr. McCabe has contributed numerous publications on complementary and alternative medicine and has been an invited speaker at many seminars and conferences. She is the editor of a nursing text book, '*Complementary Therapies in Nursing and Midwifery: from Vision to Practice*' (2001). Her most recent research examined education and regulation in naturopathy and Western herbal medicine for the Department of Human Services. Dr McCabe operates a consultancy, Complementary Care Education, providing services to the natural therapies education sector. Her research interests are the regulation of natural therapies, education, and the development of naturopathic theory and philosophy.

### EMPLOYMENT HISTORY

- 2006- Program development and design, School of Health Sciences, **RMIT University**
- 2003- Self-employed Consultant, **Complementary Care Education.**
- 2004-5 Course Coordinator, B. Nursing/B.Naturopathy, **Southern School of Natural Therapies**, Melbourne.
- 2003-5 Research Fellow, School of Public Health, **La Trobe University**
- 1999-04 Senior Lecturer in Naturopathy, School of Nursing & Midwifery, **La Trobe University.**

- 1990-02 **Nimbin Apothecary**, Nimbin, NSW. Private practice and retail, co-owner.
- 1993-9 Sessional lecturer:  
 (i) **Victoria University**, Department of Nursing (Complementary therapies);  
 (ii) Gungil Jindibah Centre, **Southern Cross University** (Nutrition),  
 (iii) **Academy of Natural Therapies**, West Burleigh Heads, (Nutrition).
- 1998 Tutor for **Royal College of Nursing, Australia**, distance education course  
*Complementary therapies as nursing interventions*
- 1989-97 Writer of the following distance education units:  
 (i) **Royal District Nursing Service**: *Breast Cancer Nursing* course. Two modules –  
 'Immunology: complementary and alternative therapies', and 'Resources for  
 strengthening immunity: complementary therapies in health care and the  
 community'. Co-written with Jill Teschendorff.  
 (ii) **Southern Cross University**: *Introduction to Natural Therapies*,  
*Introduction to Natural Therapies* (2<sup>nd</sup> edition), and *Advanced Midwifery  
 Practice, post-natal care*.  
 (iii) **Royal College of Nursing, Australia**: *Complementary Therapies as Nursing  
 Interventions*.
- 1987-8 **Kyogle and Nimbin Hospitals**. Midwifery and general nursing
- 1979-7 **Independent practice**, domiciliary midwife/naturopath. Intermittent periods of  
 casual hospital employment
- 1976-7 Naturopath, **Geelong Natural Healing Centre**.

## RESEARCH

- 2003-5 Project Manager: *The Practice and Regulatory Requirements of Naturopathy and  
 Western Herbal Medicine*. Co-authors: Prof. Vivian Lin (Head of Project), Prof.  
 Alan Bensoussan, Prof. Stephen Myers, Prof. Marc Cohen, Ms Sophie Hill, Ms  
 Genevieve  
 Howse. School of Public Health, **La Trobe University**. Funded by Department of  
 Human Services, Victoria.

Chapter 1: *Introduction to the project*. Co-authored with Prof. V. Lin.

Chapter 5: *Tertiary education in naturopathy and Western herbal medicine*. A  
 survey of education providers in Australia. (PMcC - Sole researcher).

Chapter 6: *Representation of practitioners of naturopathy and Western herbal  
 medicine by professional associations*. A survey of professional associations in  
 Australia. (PMcC - Sole researcher).

Chapter 7: *Institutional recognition of naturopathy and Western herbal medicine in  
 Australia*. An informal survey of major government and non-government  
 institutions. (PMcC - Sole researcher).

Chapter 11: *Assessing the need and options for regulation*. Assessment of research  
 findings against the AHMAC criteria, and making recommendations. Co-authored  
 with Prof. Vivian Lin and Ms Genevieve Howse.

- 2001 Doctor of Philosophy, **Southern Cross University**, Lismore, NSW. Thesis title:  
*Immanent health: Revealing the shared phenomenal ground in the traditions of  
 naturopathy, Chinese medicine and ayurveda, utilising hermeneutic philosophy*.
- 1995 Master of Primary Health Care, **University of Western Sydney**. Thesis title: *Exploring  
 the phenomenon of healing: how nurse-natural therapists construct the meaning of  
 healing*.

## THESES EXAMINED

November 2007

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- 2006 Doctoral thesis: *Yoga as a treatment for binge eating disorder*. Mr Shane McIver, School of Public Health, **La Trobe University**.
- 2007 Master's thesis: *An assessment of non-conventional measures of lung function and the effect of a herbal extract on mild-moderate childhood asthma*. Ms Sheena Maxwell, School of Health Sciences, **RMIT University**.

## PUBLICATIONS

### Research Reports

- 2005 *The Practice and Regulatory Requirements of Naturopathy and Western Herbal Medicine*. **Parliament of Victoria, Department of Human Services and La Trobe University, School of Public Health**. See 'Research' above for details of chapters contributed to the report.
- 1992 *Survey of naturopathic and herbal medicine practices in the Lismore Region January, 1992*. **Alternative Medicines Forum**, (privately published).

### Refereed Research Article

- 1995 *Exploring the Phenomenon of Healing: Healing as a Health Capacity*. **Australian Journal of Holistic Nursing**, 2(1):13-23.

### Refereed Articles

- 2005 *Complementary and alternative medicine in Australia: a contemporary overview*. **Complementary Therapies in Clinical Practice**, 11(1):28-31. (Invited article).
- 2000 *Naturopathy, Nightingale, and nature cure: a convergence of interests*. **Complementary Therapies in Nursing and Midwifery**, 6:4-8. (Invited article).
- 1998 *Revealing common ground: comparing themes in traditional natural medicine and holistic nursing*. **Australian Journal of Holistic Nursing**, (5)2:41-46.
- 1996 *Complementary Therapy in Nursing Practice: Policy Development in Australia*. **Australian Journal of Holistic Nursing** 3(1):4-11.
- 1994 *Nursing Diagnosis and Natural Therapies: A Symbiotic Relationship*. Co-authored with Gareth Daniels. **Journal of Holistic Nursing**, 12(2):184-192.

### Non-refereed Articles

- 2004 *Complementary therapies education: how much is enough?* **ACCNS Journal for Community Nurses** 9(1):17.
- 2004 *Alternatives for nursing students*. **Nursing Review**, January, p.15.
- 2003 *Teaching complementary health nursing to undergraduate nursing students*. **Nursing Review**, December, p.19.
- 2001 *Nursing and naturopathy at La Trobe: the challenge of multiparadigm education*. **International Journal of Nursing Practice**, 7:361-362.
- 2001 *Nursing and naturopathy: the challenge of multiparadigm education*. **Australian Nursing Journal** 8(8):36.
- 2000 *Naturopathy and the research dilemma*. **Diversity: Natural and Complementary Health** 2(2):47-48.

- 1998 *Choosing a complementary therapies course: what should you consider?* **Australian Journal of Holistic Nursing** 5(2):52.
- 1997 *Facing a new age of care.* **Nursing Review**, November, p.14.
- 1994 *Natural Therapies in Australia: A Nurse-Naturopath's View.* **Nurse Practitioner Forum**, 5(2):114-117.
- 1994 *Nursing, healing and natural therapies: testing the waters.* **The Lamp**, December.
- 1992 *Nursing's New Professional Paradigm.* In **Beginnings, Newsletter of the American Holistic Nurses' Association**, 12(9):1,4-5. Co-authored with Gareth Daniels.

### Professional Documents

- 2005- In progress: *Guidelines for use of Complementary Therapies in Nursing Practice*, (under review for 3rd edn). **Nurses Board of Victoria**. In consultation with Review Committee.
- 1999 *Complementary Therapies in Australian Nursing Practice.* Position Statement (2nd edn). **Royal College of Nursing, Australia**. Co-authored with Professor Bev Taylor. RCNA, Canberra.
- 1999 *Guidelines for use of Complementary Therapies in Nursing Practice* (2<sup>nd</sup> edn). **Nurses Board of Victoria**. Co-authored with Review Committee.
- 1999 *Complementary Therapies in Nursing: Briefing paper prepared to accompany the revised Guidelines for the use of Complementary Therapies in Nursing Practice.* **Nurses Board of Victoria**. Co-authored with Review Committee.
- 1997 *Complementary Therapies in Australian Nursing Practice: Position Statement.* **Royal College of Nursing, Australia**. Sole author, content refereed.
- 1994 *Natural Therapies in Relation to Nursing Practice in Australia: A Discussion Document.* **Royal College of Nursing, Australia**. Co-authored with Lyn Ramsay and Prof. Bev Taylor.

### Edited Books

- 2001 *Complementary Therapies in Nursing and Midwifery: from vision to practice.* **Ausmed Publications**, Melbourne.

### Book Chapters

- 2003 *Complementary therapies.* In *Palliative Care Nursing: a guide to practice.* **Ausmed Publications**, Melbourne. Chapter 18. Co-authored with Amanda Kenny.
- 2001 *Nursing and complementary therapies, a natural partnership.* In P. McCabe (Ed.), *Complementary Therapies in Nursing and Midwifery: from vision to practice.* **Ausmed Publications**, Melbourne. Chapter One.
- 1996 *Clinical Perspective.* In Prof. B. Taylor (Ed). *Complementary Therapies and Australian Nursing Practice.* **Royal College of Nursing Australia**, Canberra. Chapter Six.

### Book/Chapter Reviews

- 2005 *Turning the medicine wheel: Holism and complementary medicine, an historical and philosophical enquiry*, by Vincent Di Stefano. Review of book manuscript requested by **Allen & Unwin**.



- 2002 'Complementary therapies and holistic nursing practice'. Chapter 35 by B. Taylor and K. Caudell. In: Crisp, J. and Taylor, C. *Potter and Perry's fundamentals of nursing*. Review of chapter requested for second edition by **Elsevier (Australia)**.
- 2001 'Natural compounds in cancer therapy: Promising nontoxic antitumor agents from plants & other natural sources', by John Boik. **International Journal of Nursing Practice** 7:440

### Distance Education Courses

- 2001 *Prostate Cancer Nursing*. Co-author (with Dr Tim Crowe) of one module: 'Nutrition and complementary therapies in prostate cancer'. **Anti-Cancer Council**, Melbourne.
- 1998 *Breast Cancer Nursing*. **Royal District Nursing Service**, Melbourne. Co-author (with Ms. Jill Teschendorff) of two modules: 'Immunology: complementary and alternative therapies', and 'Resources for strengthening immunity: complementary therapies in health care and the community'.
- 1995 *Complementary Therapies as Nursing Interventions*. **Royal College of Nursing Australia**, Canberra. Sole author.
- 1993 *Introduction to Natural Therapies*. Centre for Professional Development, **Southern Cross University**, Lismore, NSW. Sole author.

### CONFERENCES

#### Keynote Addresses

- 2003 *Creating a new vision of health and wellness: the role of nurses in the practice of complementary health care*. **Launch of the Complementary Health Care Centre, Perth Central TAFE** by the Minister of Health, the Hon. Bob Kucera MLA. Invited speaker.
- 2001 *Complementary therapies in nursing and midwifery: from vision to practice*. P. McCabe (Ed.). **Book launch: Ausmed Publications**, Melbourne.
- 1996 *Integrating holistic natural therapies into nursing: policy and planning perspectives*. **NSW Nurses Association: Health, healing, holism**. Sydney, 7 June.

#### Plenary Papers

- 2002 *An overview of alternative therapies: Naturopathy*. **Dietitians Association of Australia, Victorian Branch**. Royal Melbourne Hospital, 6 September. Invited speaker.
- 2002 *Why are nurses considering careers in natural therapies?* **Royal Hospital for Women**. Melbourne, 10 May. Invited speaker.
- 2002 *Why are nurses considering careers in natural therapies?* **Royal Hospital for Women**. Sydney, 21 June. Invited speaker.
- 2001 *Current and potential nursing roles in complementary health care*. Ausmed Publications, **4<sup>th</sup> National Conference on Complementary Therapies**, Complementary therapies in nursing: from vision to practice. Melbourne, 1-2 March. Invited speaker.
- 1995 *A vital field - the growth of natural therapies in nursing*. **First National Electromedicine Conference**. Health through Technology Pty. Ltd. Brisbane, 19-21 August. Invited

speaker.

### Concurrent Sessions

- 2002 *Naturopathic approaches to wound healing: advancing nursing practice and patient care with complementary therapies.* **4<sup>th</sup> Australian Wound Management Association Conference**, Adelaide, 7-10 March. Invited speaker.
- 2001 *Complementary therapies in medical and surgical nursing: advancing nursing practice and patient care.* **Royal College of Nursing, Australia, 2<sup>nd</sup> National Medical/Surgical Conference**. Melbourne, 14-16 September. Invited speaker.
- 2001 *Naturopathic education for nurses at La Trobe University.* **Royal College of Nursing, Australia, Nursing Education and Employment: Regroup - Revive - Refocus**. Brisbane.
- 2000 *Integrative care: Integrating the nurse in a complementary care partnership.* **Australian College of Holistic Nurses: Rhythm, Flow and Synergy**. Lorne, Vic. 10-12 November.
- 2000 The challenge of designing a double degree in nursing and naturopathy: synthesis or schizophrenia? **Australian College of Holistic Nurses: Rhythm, Flow and Synergy**. Lorne, Vic. 10-12 November.
- 1998 *Assessment and diagnosis: getting it right for complementary therapies.* **Complementary therapies and nursing**. Second national conference on complementary therapies. **Ausmed Publications**, Melbourne, 7-8 December.
- 1998 *Writing complementary therapies guidelines for your workplace.* **Complementary therapies and nursing**. Second national conference on complementary therapies. **Ausmed Publications**, Melbourne, 7-8 December.
- ### Seminar Presentations
- 2005 'The naturopathic management of chronic illness'. Seminar for nurses provided by the Dept. of Human Services Victoria and Deakin University School of Health and Social Development, 25 August. Invited speaker.
- 2004 'Where are we heading? The future of complementary medicine'. Member of expert panel, **Natural Therapies Trade Expo**.
- 2002 'Complementary health nursing'. One day seminar commissioned by **Hong Kong Hospital Authority**. Invited to present the first ever education to HK nurses on complementary therapies in nursing practice.
- 2001 'What is naturopathy?' Seminar presentation for the **Dietitians Association of Australia**. Melbourne, 20 February. Invited speaker.
- 1998 'Complementary therapies as nursing interventions: rationale for use and strategies for integration'. Complementary therapies and pain: **Ausmed Publications** seminar, Melbourne, 17 March.
- 1998 'The role of complementary therapies in aged care'. Complementary therapies in aged care: **Ausmed Publications** seminar, Melbourne, 24 July.

## PROFESSIONAL CONSULTANCIES

The following is an outline of major projects undertaken for my consultancy, **Complementary Care Education**.

- 2005-6 **Nature Care College**, Sydney, NSW. Development of five bachelor degree subjects.
- 2005 **Southern Cross University**, Teaching and Learning Centre. Review of a Master's degree subject: *Holistic Nutrition*.
- 2005 **Chinese Medicine Registration Board, Victoria**. Review of the *Guidelines for the Approval of Courses of Study in Chinese Medicine as a Qualification for Registration*.
- 2004-6 **Southern School of Natural Therapies** (coordination of the double degree B.Nursing/ B.Naturopathy and liaison with co-provider, La Trobe University).
- 2004 **Southern School of Natural Therapies**: Review of course application documents for Bachelor degree.

### Professional consultancy work carried out prior to establishment of Complementary Care Education

- 2003 **Chinese Medicine Registration Board, Victoria**. Course assessment panellist. (Course submitted by Division of Chinese Medicine, RMIT University, Bundoora, Vic.).
- 2003 **Department of Education and Training, NSW**. Course Assessment Panelist re application to accredit courses by Nature Care College, Sydney, NSW.
- 2000-2 **Australian Traditional Medicine Society**, Review of a Professional Quality Assurance Program.

## PROFESSIONAL VOLUNTARY WORK

- 2007- **Dept. of Human Services, Victoria**. Appointed to the Chinese Medicine Registration Board's Hearing Panel List for formal and informal hearings. Currently sitting on two formal hearing panels re cases of professional misconduct.
- 2007- **La Trobe University**, Faculty of Health Sciences. Honorary Associate.
- 2003-6 **Chinese Medicine Registration Board, Victoria**, course assessment panellist. Courses assessed have been submitted by: Division of Chinese Medicine, RMIT University, Academy of Traditional Chinese Medicine of Australia, Australian College of Natural Medicine Pty. Ltd., and Victoria University (Chair of Course Assessment Panel).
- 2005 **Nurses Board of Victoria**. Member of the committee revising the Board's *Guidelines for use of Complementary Therapies in Nursing Practice* (3<sup>rd</sup> ed).
- 2000-2 **Victorian Register of Certified Homoeopathic Practitioners Inc**. Member of the Board.
- 1999-2003 **Australian Complementary Health Association**. Member of the Editorial Advisory Board for its magazine, 'Diversity'.
- 1999-2000 **Australian College of Holistic Nursing**. Member of the Scientific Committee, planning for 4th biennial national conference 10-12 November, 2000, Lorne
- 1998-9 **Nurses Board of Victoria**. Member of the committee revising the Board's *Guidelines for use of Complementary Therapies in Nursing Practice*.

- 1995-9 . **Southern School of Natural Therapies**, Melbourne. Member of Council
- 1996-9 **Southern School of Natural Therapies**, Melbourne. Member of the Curriculum Advisory Committee.
- 1994-05 **Australian Journal of Holistic Nursing**. Member of the Editorial Board.
- 1992-4 **Southern Cross University**, Lismore. Member of the Curriculum Development Committee for Bachelor of Health Sciences (Naturopathy).

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**Appendix 7. Report from Dr. Pauline McCabe****COMPLEMENTARY CARE EDUCATION****REPORT ON THE APPLICATION FOR APPROVAL AND  
ACCREDITATION OF A  
BACHELOR OF NATUROPATHY**

by  
Dr. Pauline McCabe PhD.

**WELLPARK COLLEGE OF NATURAL THERAPIES LTD.**

June 2007

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**Abbreviations**

NZQA      New Zealand Qualifications Authority

**Terminology**

The Application	Refers to the Wellpark College submission to the NZQA, titled <i>Bachelor of Naturopathy and Herbal Medicine Application for Approval and Accreditation 2006</i> .
Subject, unit	The individual components of the course.
Course	The entire programme of study required for completion of the <i>Bachelor of Naturopathy</i>

Released under the Official Information Act 1982

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This report was prepared by Dr Pauline McCabe, who has worked in higher education since 1995 and has extensive experience in natural therapies course design at bachelor and Master's degree levels. She has been invited to participate in numerous course assessment panels for the Chinese Medicine Registration Board Victoria, the Office of Tertiary and Technical Education Victoria, and the Department of Education and Training, NSW. Courses assessed have been submitted by private education providers and universities.

She was Senior Lecturer in Naturopathy at La Trobe University from 1999-2004 where she coordinated a double degree in nursing and naturopathy. Teaching experience includes nutrition, foundational studies in naturopathy, and relaxation massage.

Dr McCabe's research experience includes a Master's thesis – *Exploring the phenomenon of healing: how nurse-natural therapists construct the meaning of healing* (University of Western Sydney 1995), and a PhD thesis – *Immanent health: revealing the shared phenomenal ground in the traditions of naturopathy, Chinese medicine and ayurveda, utilising hermeneutic philosophy* (Southern Cross University 2001). She was also Project Manager at La Trobe University for policy research undertaken on behalf of the Department of Human Services Victoria on the regulatory requirements of naturopathy and Western herbal medicine – *The Practice and Regulatory Requirements of Naturopathy and Western Herbal Medicine* 2005. She conducted original research for this project and contributed several chapters to the report including those on education and the role of professional associations in self-regulation.

Dr McCabe's consultancy, *Complementary Care Education*, specialises in projects related to natural therapies education. Currently, she is also working for RMIT University part-time on the development of a Master's degree in wellness.



## Introduction

### *The Regulatory Environment for Natural Therapies in New Zealand*

#### Registration of Practitioners

The natural therapies are self-regulated professions in New Zealand. Professional associations involved in the setting of standards include *New Zealand Society of Naturopaths, Naturopaths of New Zealand and Associates*, and the *New Zealand Association of Medical Herbalists*.

Registration of naturopaths is carried out by two umbrella bodies, the *Natural Health Council* and the *New Zealand Charter of Health Practitioners*. Graduates of Wellpark College's existing Diploma of Naturopathy are eligible for registration with either of the registering bodies, and for full membership of the above professional associations.

#### Approval of Courses

Programmes within the private sector can be approved by the New Zealand Qualifications Authority (NZQA) which sets competencies and standards for various professions, but in the case of the natural therapies standards are set locally by the natural therapy educational institutions and professional associations. The NZQA has approved the current Diploma of Naturopathy offered by Wellpark College.

The major professional associations for naturopathy and herbal medicine assess and accredit courses that are submitted to them for approval, and have indicated in-principle support for a bachelor degree for naturopathy.

#### Funding arrangements

Students' tuition is partially funded by New Zealand's Tertiary Education Commission (TEC) (approximately \$5000 per full time student per year) and partially by the students themselves. TEC sets a maximum fee for courses which limits the amount students can be charged by the College.

### *History of the Application for Approval of the Bachelor of Naturopathy and Herbal Medicine*

In June 2006 Wellpark College submitted an application to the NZQA for approval and accreditation of a Bachelor of Naturopathy and Herbal Medicine. The NZQA subsequently appointed an expert panel who assessed the course and conducted a site visit at the College in August 2006.

The Panel's report, dated 4 September 2006, rejected the application but under NZQA regulations a revised application can be submitted. The College subsequently began the process of reviewing its curriculum and the application in light of the Panel's report.

A consultant was engaged (the author of this report), and conducted a site visit on 5-8 June 2006.

#### Findings of the NZQA Expert Panel

The requirements and recommendations of the Panel are set out below.

#### **NZQA Panel Comments (2006:14).**

##### **The panel requires:**

1. A total review and re-write of the course.
2. Wellpark to develop a comprehensive plan for the staffing of the degree.
3. Wellpark to enhance and sustain the library and to provide access to library resources so that the degree course is adequately supported.
4. A comprehensive long-term business plan, including capital and operational requirements, for the further development and delivery of the degree.

5. Wellpark to develop a comprehensive long-term plan for the development of a research culture to support the degree course.

#### SUMMARY OF RECOMMENDATIONS

The panel recommends that:

- Wellpark review the arrangements by which the AUT papers are incorporated into the course and consider some formal agreement with AUT.
- New students are given a "buddy" to work alongside in the clinic and that the number of cases required be reviewed.
- The clinical files are kept securely at the clinic.
- In redeveloping the assessments, that the 70% pass mark is reviewed.
- An external academic is included on the Advisory Committee.
- The entry requirements are reviewed to include a science background and to set the IELTS requirement at 6.5 with a minimum band of 6.
- Wellpark review the bridging, transition and cross-crediting arrangements for the degree.

**NB The panel cannot recommend approval and accreditation until all requirements have been met to the satisfaction of the panel.**

### Structure of this Review

#### Scope

This report is based on the understanding that the College's revised application will be for a Bachelor of Naturopathy and not a Bachelor of Naturopathy and Herbal Medicine.

The main focus of the review is the curriculum and related issues:

- (i) a revised curriculum for the B. Naturopathy and factors that directly support the curriculum including learning and teaching strategies, the graduate profile, and the aims of the course
- (ii) course documentation, in particular the course outlines and learning outcomes
- (iii) development of a research culture at Wellpark College.

This report is only concerned with issues such as the administration and resources of the College insofar as a response has been made to some of the Panel's comments in these areas.

#### Framework

The framework for this report was informed by the NZQA's requirements for the *Approval and Accreditation of Courses Leading to Degrees and Related Qualifications (2003)*, and the NZQA Expert Panel's *Degree Approval and Accreditation Report (2006)*,

Information on Standards has been informed by the *Guidelines for the Approval of Courses of Study in Chinese Medicine as a Qualification for Registration*<sup>1</sup> (2006). This document is provided as Appendix 1.

### Details of the Education Provider

Wellpark College of Natural Therapies is located at 6 Francis Street, Grey Lynn, Auckland. Both the campus and the school administration are located at this address.

The Unit responsible for the course is the Faculty of Naturopathy.

<sup>1</sup> Chinese Medicine Registration Board, 2006. *Guidelines for the Approval of Courses of Study in Chinese Medicine as a Qualification for Registration*. See Appendix 1. Also available at: [www.cmr.gov.au](http://www.cmr.gov.au). November 2007

Wellpark College is an independent, private education provider and is fully owned by the Prema Charitable Trust, a registered trust. From 2007, Wellpark College will operate as a limited liability company.

The College is accredited by the New Zealand Qualifications Authority as a Registered Private Training Establishment (NZQA Provider Code: 8341). The current naturopathy course was accredited by the NZQA in 1998 as a *Diploma of Naturopathy*.

### **Purpose and Mission of the School**

Several statements on the mission and vision of the College were located in the documentation provided and are set out below.

#### **Company Vision / Mission Statement (QMS Manual 2007:3)**

The vision of Wellpark College of Natural Therapies is 'to educate students to be qualified and registered natural therapists working in an integrated national health care system'.

#### **Mission (QMA Manual 2006:3)**

Wellpark College of Natural Therapies states that its mission is captured by the following broad objectives

- To develop and deliver educational courses for natural therapies
- To establish research into natural medicine
- To foster excellence in natural therapies education and practice
- To provide community education in natural therapies.

#### **Vision (Prospectus 2007, inside front cover)**

- That natural therapies will become a respected and integral part of the health care system
- That all people may have access to natural health care whatever may be their circumstances in life
- That prevention rather than cure be the prime motivation behind all health care
- That natural therapies graduates will play a respected and integral role in society.

### **Consultant's Review – Mission Statement**

The above statements reflect a strong commitment to advancement of the profession. This can be a strength, on the other hand some reviewers may see it as being too inwardly focused. The mission statement should be viewed as a strategic document which sets values and directions for the College. As such it needs to broadly reflect the philosophy of the College and its future directions. These may change over time for a variety of reasons, including changes in the community's requirements of the natural therapies professions. Consequently, the mission statement, its values and directions, need to be periodically reviewed, say every five years, to assess whether progress can be demonstrated. In reviewing the mission statement, the College may wish to formulate strategic goals which can be evaluated regarding progress towards those goals.

#### **Recommendations**

1. That the vision and mission statements be redeveloped into one mission statement and that the same version of the mission statement be included in all documents.
2. That the mission statement be reviewed periodically to assess its continuing relevance, whether the activities of the College and its curricula reflect the mission statement, and whether progress towards any strategic goals can be demonstrated.

## Findings of the Consultant's Review

### 1.0 Title, Aims, Learning Outcomes and Coherence

The adequacy and appropriateness of the title, aims, stated learning outcomes and coherence of the whole course.

#### 1.1 Title of the course

Approval was sought from the NZQA for a 'Bachelor of Naturopathy and Herbal Medicine', but this title was rejected by the Panel.

#### NZQA Panel Comments (Report 2006:2).

**1.1a** *The title of the course provides an accurate indication of its general subject areas.*

The panel agreed that the title did not meet the criterion. While herbal medicine is a necessary component of a naturopathy degree, there was insufficient herbal medicine content to warrant the inclusion of "herbal medicine" in the title. Wellpark should reconsider the title as part of the review of the course.

**1.1b** *The title of any qualification(s) awarded on the basis of successful completion of the course, or part of the course, is consistent with the title of the course and the requirements on nomenclature in the general registration criteria for the New Zealand Register of Quality Assured Qualifications (the Register) ([www.nzqa.govt.nz/qualifications/register/index.html](http://www.nzqa.govt.nz/qualifications/register/index.html)) and relevant conventions (See Special Issues section).*

The title does not currently meet the Register criteria, as it does not accurately describe the content.

The College has decided to remove 'Herbal Medicine' from the title. The revised application will be for a Bachelor of Naturopathy.

#### 1.2 Aims

(a) *The stated aims are clearly defined and appropriate to the nature and level of the qualification to which the course leads.*

(b) *The aim includes identification of any specifically-targeted student body and the relationship between the course and any industrial, professional or community need.*

The College stated the aim of the course as follows:

The aim of the course is to produce graduates who, for the benefit of individual patients/clients and society as a whole, can practice naturopathy and herbal medicine, integrating traditional wisdom and knowledge related to well-being, with modern medical science. Graduates may work in a variety of settings related to naturopathy and herbal medicine, including clinical, education, research, and advisory roles to manufacturers and to government in relation to policy (Application 2006:11).

The underlying philosophy of the course was described in the Application as follows:

The values that underpin the course reflect both the core values of Wellpark College of Natural Therapies and those inherent within Complementary and Alternative Medicine. These values, outlined below, have been inherited from generations of naturopaths and herbalists, from the earliest origins of medicine itself.

- Aroha – love and caring for all
- Rangimarie – peacefulness in all our activities
- Mahi Tika – appropriate activity that respects others
- Pono – fostering the truth that we are all connected.

These values are consistent with the following accepted values pertaining to the practice of naturopathy and accepted world-wide.

- First do no harm: *Primum no nocere*
- Practice the healing power of nature
- Identify and treat the cause: *Tolle causam*
- Treat the whole person – consider the multifactorial nature of health and disease
- Practice prevention – prevention is the best ‘cure’ (Application 2006:12).

The Panel was critical of the aims and the underlying philosophy.

#### NZQA Panel Comments (NZQA Report 2006:3)

The stated aims were totally pragmatic in that the degree is intended to help raise the status of the profession and to integrate traditional wisdom and knowledge related to well-being with modern medical science. The aims were however less than satisfactory in terms of providing a philosophical base for the course.

Wellpark was advised to include a review of the aims and philosophical base in the required review of the course.

#### Consultant's Review – Philosophy and Aims

The course aim and the underpinning philosophy of the course are separate concepts but they are also inextricably linked. The aim needs to be a succinct expression of the purpose of the course, while the philosophy provides a broad statement of the values and beliefs underpinning the course.

The philosophy underpinning the course needs debate and development by the Wellpark College academic community. It is an important statement which will inform the content, integrity and cohesiveness of the course, and also identify what the course can and cannot achieve. The philosophy should be structured so that its principle components can be evaluated regarding (i) the philosophy itself and (ii) whether the course is succeeding in adhering to the philosophy. The philosophy should be reviewed periodically and adjusted as necessary to reflect the changing values of the College, the students, and the community.

The College may wish to conduct a literature review on philosophies of naturopathy and health, and develop a discussion paper for circulation to staff and feedback.

#### *Philosophy: Key points for consideration*

The naturopathy course is based on the philosophical principles outlined above and elaborated in Myers<sup>2</sup> et al (2003:50-52). The philosophy could be further developed by consideration of concepts such as the following.

**Health** – Wellpark's documents, including the Prospectus (2007), appear to take the position that naturopathy is grounded in health. If this is a significant part of the philosophy it should be reflected in the curriculum with students gaining a comprehensive understanding of health, i.e. the normal

<sup>2</sup> Myers SP, Hunter A, Snider P, Zeff J, 2003. Naturopathic medicine. In T. Robson (Ed): An introduction to complementary medicine. Sydney: Allen & Unwin.  
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state of body/mind systems, the health of families, communities and the environment, and health assessment (how to recognize the normal, and therefore deviations from normal that require treatment or referral).

**Holism** – A broad understanding of holism encompasses key concepts such as interconnectedness, interrelationship, interdependence, and the whole being greater than the sum of the parts. The College emphasises in its courses and clinical practice the integration of the four modalities taught at the College (massage, herbal medicine, nutrition and homoeopathy) with counseling and thereby aims to provide a holistic approach. The holistic approach is based on the premise that the mind, body, spirit and emotions are indivisible, and that the person is influenced by the environment. The challenge is to clarify the approach taken to holism and embed it into the philosophy and the curriculum in a realistic manner.

**Integration** – The concept of integration is relevant to several areas: (i) the integration of naturopathy with Western sciences; (ii) the integration of various modalities into a cohesive naturopathic framework; and (iii) the relationship between naturopathy and mainstream healthcare. Integration is valued by the College and should be part of the course philosophy.

**Research** – The College's position on research and critical thinking needs to be reflected in the philosophy underpinning the naturopathy course.

**Ethics** – Ethical values of the profession should be demonstrated in the philosophy.

**Service** – Ways in which the course promotes service and contribution to the profession and the community can be included in the philosophy.

It needs to be demonstrated that the course philosophy and aims underpin the curriculum and the outcomes for students and graduates, for example by mapping components of the philosophy and course aims to the graduate capabilities, and by adding a section to each unit outline indicating the graduate capabilities addressed in the unit.

#### *Course Aims: Key points for consideration*

As noted above, the Panel was critical of the aims in the Application, finding them pragmatic. Expansion of the course philosophy should answer part of the criticism by expanding the underpinning values. The aims need to address what the College intends to do, whereas the graduate profile identifies the capabilities graduates should achieve. Aims must be measurable to enable review so that the College can identify successes and areas that need improvement. The aims will evolve over time in response to changes in the profession and the community.

The overall aim of the course is:

- the preparation of graduates who will be eligible for registration with a registering body – achievable by developing learning outcomes in the three key standards<sup>3</sup> of: *theoretical knowledge, clinical skills, and professional practice* (ethics, communication skills, practice management, lifelong learning).

Additional aims could address areas such as:

- response to community demands for a high standard of education for healthcare providers – achievable through regular consultations with stakeholders and quality assurance processes
- protection of the public and responsibility to the community – achievable through addressing professional issues in the curriculum and through quality assurance processes
- increasing opportunities for graduates in employment and in postgraduate education and research – achievable through regular consultations with stakeholders and regular review of the curriculum.

The aims are required to be appropriate to the level of the course (bachelor degree).

<sup>3</sup> CMRB 2006:11  
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**Recommendations – Course Aims and Philosophy**

That the philosophy underpinning the naturopathy curriculum be revised.

That the course aims be revised

That components of the philosophy and the course aims be mapped to the graduate capabilities

That the philosophy and aims be reviewed periodically

**1.3 Learning Outcomes****1.3.1 Educational Philosophy**

A statement outlining the approach to learning and teaching was not included in the first Application. Nevertheless, the College had developed a range of statements on educational values as follows.

The College is committed to quality education that is infused with the values that form the foundation of natural therapies and to the broader recognition of natural therapies within New Zealand (QMS Manual 2006:2).

Wellpark College of Natural Therapies is committed to the following values:

- The principle of holism in health and education
- Honouring an education process that seeks to bring out excellence in students, staff, teachers and support staff
- Promoting education and discussion that serves society in a meaningful way across a range of areas including social services and health care disciplines
- Valuing research so as to establish the place of natural therapies within the health care environment
- A values-orientated approach to education (QMS Manual 2006:3).

**Consultant's Review – Educational Philosophy**

Wellpark College aims to offer an innovative and contemporary Bachelor of Naturopathy programme. College staff are aware of the pedagogical requirements for higher education and appear determined to meet this requirement through a targeted professional development program for staff (see section Appendix 11, pages 323). The mode of educational delivery for the new curriculum will be grounded in the principles of adult learning, critical thinking, problem solving and flexible learning.

A range of learning and teaching approaches will be employed to support students with varied learning styles to achieve the learning outcomes. The learning and teaching strategies will be set out in the outline for each individual course of the new Bachelor of Naturopathy curriculum.

The existing educational values are problematic in the sense that they may be difficult to operationalise and also to evaluate regarding whether the College is succeeding in integrating and demonstrating these values.

**Recommendations**

That the philosophy and principles that inform the approach to teaching and learning be clearly articulated.

That a wider range of learning and teaching strategies be employed to meet the learning styles of students, develop higher order capabilities in students, and achieve the learning objectives of bachelor degree subjects.

### 1.3.2 Course Outcomes Statement

The graduate profile is required to be consistent with the aims of the course and the requirements of the Register.

#### Consultant's Review – Course Outcomes

The Panel found that the graduate profile was consistent with the current aims of the course and as such would meet the Register requirements. However, as the course aims were required by the Panel to be redeveloped, the graduate profile will need to be revisited.

It is suggested that, in revising the course and the graduate profile, the College consider the Standards outlined by the Chinese Medicine Registration Board of Victoria in its Guidelines for the Approval of Courses of Study in Chinese Medicine<sup>4</sup> which have general applicability to natural medicine education:

- Standard 1: Graduate Knowledge, Skills and Attributes
- Standard 2: Course Structure and Operations
- Standard 3: Course Management
- Standard 4: Resources and Physical Environment
- Standard 5: The Curriculum.

Standard 1, Graduate Knowledge, Skills and Attributes, requires that graduates have acquired capability in three key areas:

- Theoretical Knowledge – sufficient knowledge of the theory of the discipline, western medical sciences, and the role of the discipline in the health care system to enable safe and competent practice.
- Clinical Skills – ability to gather information from a client, analyse the data, plan treatment and manage the case.
- Professional Practice Skills – this complex area requires adequate practice management, interpersonal and communication skills, professional ethics and values, awareness of the need for professional development, and the critical literature appraisal skills which enable effective career-long learning.

These three key areas or 'streams' can be mapped across the curriculum enabling systematic and gradual development of the desired graduate capabilities.

#### Recommendation – Course Outcomes

That the graduate profile be reviewed and brought into line with the new course aims  
That theoretical knowledge, clinical skills and professional practice skills be mapped across the revised curriculum to ensure systematic and sequential building of graduate capabilities in these areas.

### 1.3.3 Learning Outcomes

Clear learning outcomes must be specified for each component of the course. The learning outcomes set out in each subject outline raised concerns for the Panel.

<sup>4</sup> CMRB 2006 op cit, pp.12-30  
November 2007



**NZQA Panel Comments (2006:3-4)**

**1.3b** *Clear learning outcomes are specified for each component part of the course.*

There were serious concerns about the lack of depth, the unacceptable breadth of the content, the lack of evidence of higher order learning and thinking skills as demonstrated by the learning outcomes.

**Consultant's Review – Learning Outcomes**

Wellpark College is revising the curriculum and will develop new learning outcomes in line with the Panel's requirements.

**Recommendation – Learning Outcomes**

That the learning outcomes established for the new curriculum reflect the need for students to develop higher education learning skills from year one.

**1.4 Coherence**

Coherence of the course is evidence by the consistency between the learning outcomes, aims and level of the course. The levels and credits allocated to each component of the course should be appropriate and should reflect the value of the qualification.

The curriculum submitted by Wellpark College to the NZQA was essentially the existing Diploma of Naturopathy course with some additional bachelor degree subjects. Learning outcomes for most of the course were set at levels five and six, with three courses in the final year set at level seven (one of these, *Health Research*, was to be provided by Auckland University of Technology).

**NZQA Report Comments (2006:3-4)**

**1.4a** *Learning outcomes are consistent with the aims and level of the course.*

The learning outcomes are not consistent with a degree level course. They are more appropriate for a diploma course than a degree.

**1.4b** *Appropriate levels and credits are allocated to each component of the course.*

There were concerns here, as the learning outcomes and the levels ascribed do not reflect the content which appears to be largely vocational and less indicative of higher learning. The learning outcomes and the levels ascribed are not at degree level.

**1.4c** *The level and credit value of any qualification to which the course leads are appropriate, clearly identified and meet the minimum requirements of the Register.*

The levels of the components do not meet the prescribed level of the course. Therefore the course/qualification level is not accurate and would not meet Register requirements.

The panel agreed that Wellpark needed to review and rewrite the course and that the review should include, but not be limited to, the title, philosophy, aims, rationale, course outcome, learning outcomes, levels and credits and assessments.

**The panel requires** a total review and re-write of the course.

### Consultant's Review - Coherence

The unit documentation included in the Application reflected the traditional vocational approach to education including vocational level learning outcomes, learning and teaching strategies, and assessment. The learning outcomes were not clearly linked with the aim to produce graduates at bachelor degree level.

The spread of levels is apparently consistent with NZQA requirements which stipulate a minimum requirement of 72 credits (20 %) of courses at level 7 for a bachelor degree.

There has been a tendency in naturopathic education in Australia for a similar model, that is a 'three plus one' model consisting of three years at advanced diploma level, followed by a fourth year at bachelor degree level. This model has created significant issues in natural therapy education in Australia, including the lack of development of critical thinking skills in the first three years of training. It is difficult for students to make up this ground in the final year when learning habits at vocational level have become entrenched. Ultimately, this approach to education is detrimental to the profession as a whole, particularly as it may limit the capacity for postgraduate education.

Higher education requires that higher level educational skills be developed over the whole course, commencing in year one. For example, the writing of academic essays and literature reviews should commence in first year. This may be at level five but by the third year of the course students should be able to produce essays and literature reviews at level seven.

Similarly, learning outcomes must reflect the need for students to become independent learners, and to develop critical thinking skills and an acceptable standard of professional practice. The learning outcomes in the subject outlines are closely related to the content and appear to support a pedagogy where students are to 'learn and reproduce' rather than think critically.

The credit point formula used by the College is that one credit point is equivalent to approximately ten total learning hours for the student. The number of total learning hours is based on the number of face to face teaching hours plus an estimate of additional study hours required, approximately 60% face to face hours and 40% self-directed hours.

This credit point formula requires a greater proportion of contact hours than is normally the case in higher education, and it is likely that it would not adequately cover the time spent by many students on self-directed study and assessment tasks. The balance in higher education is generally that one contact hour will generate one to two self-directed study hours, including time spent on assessment. For example, 20 contact hours may generate an additional 40 study and assessment hours with a total of 60 learning hours, depending on the nature of the subject. Moving to this proportion may assist the College to reduce the teaching contact hours as students become more self-directed.

The vocational approach to assessment evident in the unit outlines, which is fairly prescriptive, would contribute to a high student workload, partly due to the fact that workload does not appear to be directly linked to the credit point value of a subject.

It should be noted that a high student workload contributes to stress and also to poor quality learning. Depth of learning (understanding rather than repeating facts by rote, and the ability to deal with complexity), is compromised when student workloads are too high. Providing a more realistic estimate of total learning hours for a subject will also enable students to better estimate the impact of study on their lives.

The subject outlines are being revised as required by the Panel.

### Recommendations

That a clear formula for credit point values be established, be consistent with the requirements of higher education, and incorporate the assessment workload.

That higher education learning skills be required of students from year one of the course

That the proportion of contact hours to study hours swing more towards 1:1 or 1:2

**Classification of the Programme**

The course was classified under the *New Zealand Standard for Classification of Education* (NZSCED) as NZSCED Code 06 19 01.

This classification was considered appropriate by the Panel (NZQA Panel Report 2006:4).

Released under the Official Information Act 1982

## 2.0 Delivery and Learning Methods

### The adequacy and appropriateness of delivery and learning methods, for all modes of delivery, given the stated learning outcomes

The proposed modes of delivery and delivery sites are required to be clearly identified and the learning methods appropriate to the course. Practical work based away from the delivery site should be well integrated into the course.

The Panel generally considered delivery and learning methods to be adequate. There was concern about the nature of the relationship with Auckland University of Technology (AUT) and the lack of any formal agreement with AUT to deliver subjects that might be part of the proposed Bachelor of Naturopathy. Wellpark College now intends to negotiate a formal Memorandum of Understanding with AUT.

Of more concern to the Panel was the nature of the clinical practicum, and several issues were raised.

The College's Student Clinic, the Prema Clinic, is an attractive purpose built facility in a suburban residential street in Greycliff. It is set well back from the street, surrounded by gardens, and not visible from the street.

Students operate with the framework of Wellpark College's Clinic Policies and Protocols and Code of Ethics.

The clinical practicum runs over the two semesters of the final year (third year) of the course. It consists of 330 contact hours and total learning hours are estimated at 600. The contact hours are made up of: (following information supplied by Phillip Dowling)

- 25 cases in depth. Each case is to have one follow-up consultation, and three cases must have three follow-up consultations, making a minimum requirement of 53 consultations over the two semesters.
- Case Discussions – 3 hours per week of tutorial time where students discuss their cases with five different practicing naturopaths.
- Observation of naturopaths in practice – a total of 15 hours. Naturopathic tutors are not required to be a member of an association although all tutors employed at the time of writing this report were association members.
- Reception duties and clinic management
- Mobile clinics (15 hours) – however this was not scheduled for 2007.

Students must find all their own clients for the clinical practicum.

#### NZQA Panel Comments (2006:5)

##### **2.1** *Proposed modes of delivery and delivery sites are clearly identified.*

The modes of delivery and the delivery site are clear, apart from queries about the Auckland University of Technology (AUT) modules, which will be delivered at AUT's North Shore campus. The issue of the AUT modules is dealt with under Criterion 2.3. The suggestion of flexible delivery has been put on hold.

##### **2.2** *Delivery and facilitated learning methods are appropriate to the nature of the course, the proposed modes of delivery and the likely student body.*

The delivery and facilitated learning methods appear to be appropriate apart from some concern about the lack of laboratories.

##### **2.3** *Any practical, field-based or work-based components, including research, which are based away from the delivery site are integrated into the course.*

Clinical work is carried out at Wellpark's own clinic and it is well integrated into the course. There was some concern however about the AUT modules. If they are modules

belonging to AUT and delivered entirely by them, it is doubtful that they can be considered to be a part of the degree. There appeared to be no formal arrangement to confirm the modules as part of the degree award, nor to confirm the delivery of them. The panel was concerned about the students and the programme if AUT decided for whatever reason, to no longer deliver these modules to the Wellpark students.

**It is recommended** that Wellpark review the arrangements by which the AUT papers are incorporated into the programme.

#### **2.4 Delivery methods do not place students or the public at risk (emotional or physical).**

There were some concerns about the fact that the students only had to complete 25 clinical cases which might not give them sufficient experience and skills to be fully competent to practice on completion of the course. However getting enough face-to-face cases was seemingly difficult and clinical practice and the requisite number of clinical cases, varied at different institutions. A buddy system in which newer students are "buddied" with more experienced students, would provide new students with exposure to higher number of patients and also introduce a kind of mentoring system which would help with the supervision problem.

**It was recommended** that new students be given a "buddy" to work alongside in the clinic and that the number of cases required be reviewed.

Of more concern was that there was only one clinical supervisor, who could not possibly supervise students adequately alone. This situation could potentially place the students/and or clients at risk. This issue is dealt with further under Criterion 6.

The panel was further concerned that the students took clinical files home to write up their reports. This could breach legal requirements for privacy and potentially put students at risk. The files should be kept securely at the clinic and Wellpark must ensure that the students have appropriate time and space to write their reports.

**It is recommended** that the clinical files be kept securely at the clinic.

#### **Consultant's Review – Delivery and Learning Methods (Clinical)**

The amount of supervised clinical practice was of concern to the panel. The structure and amount of clinical practicum varies widely in naturopathy courses generally. A recent report<sup>5</sup> found a range of 198-800 hours of clinical practicum in Australian courses, and 1200-1500 in North American courses. The same report noted criticism of clinical requirements based on hours spent in a clinic (which may not always be spent usefully) compared to requirements for students to be exposed to a specified number and range of case types covering a variety of diseases and disorders in both adults and children.

Wellpark College's student clinic is a commendable facility but it has a significant disadvantage in its invisibility to the general public. Consequently it is rare for potential clients to locate the clinic and seek out treatment on their own initiative. Students must find their own clients which may be challenging for some, and also may not result in exposure of students to sufficient variety of disorders. It is noted that the College does assist if students have difficulty finding sufficient patients.

The buddy system recommended by the Panel appears to be a good suggestion and may fit as part of the new second year subjects, *Health Assessment 1* and *2*. It would also be beneficial for students to be exposed to clinical practice in first year. This would provide students with the opportunity to experience naturopathic practice early in the course, and also allow for clinical experience to be developed across the whole three year curriculum.

#### *Clinical policies and guidelines*

<sup>5</sup> Lin V et al 2005. The Practice and Regulatory Requirements of Naturopathy and Western Herbal Medicine. Department of Human Services Victoria. Chap. 5, p.148.  
November 2007

The Clinic Policies and Protocols and the Code of Ethics would benefit from a review. In particular, policy and guidelines could be improved or developed in areas such as:

- dispensing of naturopathic and herbal remedies
- notification of adverse reactions
- handling and follow-up of incidents such as accidents and emergencies
- privacy and confidentiality
- referrals to other healthcare practitioners
- universal hygiene measures
- clinical management of patients taking pharmaceutical drugs
- advice and information provided to patients about medical immunisation
- advertising and testimonials, and
- continuing professional development.

### **Recommendations – Delivery and Learning Methods (Clinical)**

That clinical experience commence in first year

That the College investigate ways to increase client traffic into the student clinic

That the Clinic Policies and Protocols be reviewed

That a buddy system be introduced pairing junior with senior students.

### **3.0 Assessment**

**The adequacy of the means of ensuring that assessment procedures are fair, valid, consistent and appropriate, given the stated learning outcomes**

Assessment methodology and planning must be appropriate to the course, and the required standards for assessment clearly specified in relation to each component part of the course.

The College set out the assessment philosophy and policy in the Application (2006:17-18).

#### **3.1 Assessment Standards and Unit Outlines**

The College's Application contained a unit outline for each subject in the bachelor degree course. The unit outlines were clearly set out and specify the level, credit value, learning hours, pre-requisites, the purpose of the subject, its learning outcomes, content, learning and teaching strategies, the assessment, learning and teaching resources, and the required and recommended reading.

A range of possible assessment strategies (formative and summative) was listed for each subject. A table specified all the formative and summative assessments and matched each one to the learning outcomes it addressed.

The range of assessment types across the whole course was reasonably broad.

All subjects required a pass mark of 70%.

### **NZQA Panel Comments (2006:6)**

#### **3.1 Assessment methodology and planning are appropriate**

Assessments have been planned to match the documented learning outcomes and weightings have been given in relation to those. The methodology is not always appropriate however.

**3.2** *The required standards for assessment are clearly specified in relation to each component part of the course.*

The panel considered the assessments to be inconsistent, lightweight, and not sufficiently robust for the units of work. The panel was concerned about the required 70% pass mark and the lack of an acceptable rationale for its ongoing use.

As assessment relates to learning outcomes, levels and credits, the proposed sample assessments need to be included in the review requested in Requirement 1.

**It is recommended that** in redeveloping the assessments, that the 70% pass mark is reviewed.

### Consultant's Review – Assessment Standards and Unit Outlines

The approach to assessment for the naturopathy and herbal medicine courses at the College evolved in recent years to accommodate the requirements of the NZQA for Diploma level education. Attempts were made to raise the level for the bachelor degree application, but the unit outlines which accompanied the Application did largely reflect a vocational approach to assessment.

The approach to assessment is often based on the concept of competence. Assessment is integrally related to the future work role of the learner, and this underpins the delivery of the course and the achievement of competency by the learner. Strategies and approaches are selected to encourage learning and assessment tasks are based on matters of relevance to the participants' future work role. The course tends to be highly practical in nature.

Various assessment strategies are used in order to achieve the learning outcomes of units and of the course.

Examination of the unit outlines also suggested a pedagogy where students were expected to learn and reproduce rather than think critically. Learning outcomes and assessment were closely matched to the content, and a high number of assessments were set to ensure that students could reproduce what had been taught in class. For example *Herbal Materia Medica* included compulsory weekly tests and workbooks as well as two assignments. It appears that the approach to teaching in many subjects was to 'work through a list' of content and attempt to provide all the content, rather than exposing students to deeper principles and concepts that support understanding. Of course providing content is still necessary and some 'lists' are important, so that flexibility is required regarding pedagogical approaches. However, the focus at bachelor degree must remain on student centred learning and facilitating the process of becoming an independent, lifelong learner.

The range of assessment types was reasonable but could be broadened for several reasons – to better address bachelor degree requirements, to improve the variety of experience for students, and to further cater to the different learning styles of students. Examples of assessment types not found in the subject outlines include literature review, annotated bibliography, reflective journal, open book or take-home exams, report, and poster.

Assessments need to measure students' knowledge and skills, but they also need to develop academic abilities systematically across the whole programme. These abilities include (but are not limited to), information literacy (sourcing reliable information), academic writing, critical thinking and analysis, problem solving, public speaking, networking, preparing reports, academic ethics, professional standards and accountability, mentoring, teamwork and leadership.

Assessment types need to be mapped across the whole course to provide an overview, assess the actual assessments against the assessment policy/principles, and facilitate the planning process.

The approach to assessment needs to be less prescriptive and more flexible, and some redesign of the unit outlines would assist. Suggested changes are to reformat the assessment tables to remove the learning outcomes column, and instead of describing a range of possible assessments, describe what the approach to assessment in the subject actually is.

A significant issue was the tendency to set a high number of assessments for individual subjects, and also to include compulsory but unmarked assessments. Such 'hurdle' requirements should be prescribed for few subjects and only where necessary. Lecturers must be able to justify setting a hurdle requirement. As a general rule two (or at most three) pieces of assessment per subject should be sufficient, with one falling due some time in the middle of the semester (and ideally this should be coordinated so that students do not have numerous assessments for different subjects due in the same week). Setting assessment due dates during the semester also provides formative feedback for students.

The lists of learning and teaching resources in each subject outline may 'undersell' the resources actually available for some subjects. Lecturers may be able to expand on this section of the subject outlines.

The quality of textbooks did not always reflect bachelor level education. Several texts were sometimes prescribed for a subject and this can impose quite a cost burden on students. Where possible, texts should be prescribed that students will be able to use for later subjects, e.g. in herbal medicine and nutrition. Some unit outlines required or recommended texts that are quite old. The reading lists need to be updated to take advantage of more recent and higher quality publications.

It is noted that the policy of setting the pass mark at 70% has been changed and the pass mark is now 50%. This will greatly benefit students as they will be better able to gauge their academic abilities against requirements in other higher education institutions. Additionally, universities will be better able to assess the abilities of Wellpark College graduates who apply for postgraduate programs. However, the policy regarding grading methods for bachelor degree students is not clear (Quality Management System 2007, p. 47, third last paragraph). A suggested grading system is set out below.

Suggested Grade	Mark Range (%)	Qualifier
A	80-100	High distinction
B	70-79	Distinction
C	60-69	Credit
D	50-59	Pass
N	0-49	Fail

N.B. Marks of 45-49 would generally make the student eligible for a supplementary assessment.

#### Recommendations – Assessment Standards and Unit Outlines

That the variety of assessment types be increased

That assessment types develop academic skills as well as test subject knowledge

That all pieces of assessment be mapped across the whole course to facilitate assessment planning and quality assurance

That assessment types be mapped against graduate capabilities to ensure academic skills and abilities are developed as well as discipline knowledge and skills.

That the Assessment section of the unit outlines be redesigned to allow a more flexible approach to the setting of assessment.

That the number of assessments per subject be reduced to two or three to allow for more depth in assessment requirements.

That the number of unmarked 'hurdle' requirements be reduced significantly and that their use be justified.



That the Learning and Teaching Resources sections be checked to ensure they adequately reflect the resources actually used in each subject.

That prescribed textbooks be reviewed and upgraded as appropriate to reflect the requirements of bachelor degree education.

That, where possible, the number of required texts for a subject be reduced

That the grading system be brought into alignment with accepted bachelor degree standards

### 3.2 Feedback to Students and Fair Reporting

The College has developed comprehensive policy on assessment processes (QMS 2007:46-7).

Regular feedback is provided in both formative and summative assessments, enabling students to judge their progress and abilities.

Marking guides have been developed and include statements of capability to indicate the level of students' achievements

### NZQA Panel Comments (2006/6)

**3.3** *Learners are provided with fair and regular feedback on progress and fair reporting on final achievements.*

There are systems in place relating to both formative and summative assessments. It seemed that part-time students would have individual short courses to catch up, but it was unclear as to how this would work in terms of assessments.

### Consultant's Review – Feedback to Students and Fair Reporting

It is important to provide formative as well as summative assessment and this process should be continued. However, assessment strategies for bachelor degree students will need to encompass academic skills such as writing and referencing, the capacity to think critically and problem-solve, and demonstration of information literacy.

Marking guides could be redesigned to include these capacities and broaden the range of measures of ability.

The Assessment Policy (QMS 2007 section 12.2) was not clear about the process that occurs when a student is late in submitting an assessment, or whether an extension of time can be sought *before* the due date for submission. Regulations about late submission need to be clear and penalties should be applied with fairness and impartiality to prevent some students from unfairly gaining more time than their peers. It should be possible to put in an application for an extension of time before the due date if the student has reasonable grounds. The application should be approved and signed by the lecturer, and the form attached to the assessment when it is finally handed in.

Section 12.2 of the QMS indicates that students' marked assignments are to be collected from assignment boxes in the hallway. This appears to contradict privacy requirements. Policy in the QMS (section 13.1) states that 'The College will exercise the strictest confidentiality with regard to access to and divulgence of student assessment results'. Normal practice to protect privacy is that marked assessments are kept in a lockable facility under the supervision of a staff member, who will only hand a marked assessment to the student who is the author of the work (unless that student provides a signed letter permitting another person to collect their work).

**Recommendations – Feedback to Students and Fair Reporting**

That marking guides appropriate to bachelor level learning and assessment be developed

That the Assessment Policy be reviewed to ensure that its principles, processes and strategies are appropriate to bachelor level education

That the Assessment Policy includes a process for dealing with late submission of assignments by students and sets out the penalties that apply.

That the Assessment Policy includes a process to enable students to apply for an extension of time to complete an assessment.

That marked assessments be kept in a lockable facility under the supervision of a staff member.

**(College note: Marked assignments are assigned numbers and not names. This is the system utilised to ensure privacy)**

**3.3 Moderation Processes**

The College has set out policy covering both internal and external moderation (QMS 2007 section 12.4). Internal moderation processes are established and have recently been improved.

The assessment policy indicates that 'all assessment activities shall be subject to internal and external moderation to ensure that assessment processes are fair, valid and reliable' (QMS 2007 section 11.1).

Regarding external moderation, the College states that it will 'comply with the AMAP requirements of the various industry groups covered by the scope of its accreditation. The College will arrange external moderation for all programmes according to the requirements of each professional modality' (QMS 2007 section 12.4).

**NZQA Panel Comments (2006:6)**

**3.5** *Pre-assessment moderation of summative assessment tasks ensures that they are fair, valid and consistent.*

Internal moderation procedures for existing courses are documented in the Quality Management System (QMS). It appears that it is intended for the degree programme, especially the pre-assessment moderation. Staff commented on the improved internal moderation system.

**3.6** *External post-assessment moderation of examples of student work and marking/grading ensures that assessment outcomes are fair and consistent.*

The external moderation is included in the documentation, but the description of the process is limited and no arrangements have been made to date with another tertiary institution.

**Consultant's Review - Moderation**

The small number of students in many classes means that only one lecturer is involved in marking the group's work and consequently, for these small classes, inter-rater reliability is not an issue (providing the lecturer has adequate assessment experience). Where larger groups are involved, the system of internal moderation appears to be satisfactory.

As the Panel noted, external moderation is limited and is an area for improvement.

**Recommendation – Moderation**

That a system for an appropriate level of external moderation be established.

#### 4.0 Acceptability of the Course and Stakeholder Consultation

Wellpark College conducted an extensive development and consultation process in formulating the degree curriculum. Discussions were held with senior academic staff, Australian universities offering degree programs, the University of Auckland, and Auckland University of Technology. An internal degree development group was formed at the College and a graduate profile and outline of a bachelor degree were developed. Two stakeholder consultation meetings were held and provided input into the draft curriculum and its aim, philosophy, core competencies, scope of practice and graduate profile. A draft Application was forwarded to five professional associations and two key Maori organizations involved in traditional medicine for comment. External critique was sought from a practicing Medical Herbalist and a naturopathic educator.

As a result of the consultation process the College established an Advisory Committee to provide professional input and oversight of the Application for degree status. Members of this committee included practicing naturopaths, members of key professional associations and Wellpark College academic and administrative staff.

Letters of support were received from two professional associations, two natural therapy clinics, and four manufacturers.

A three year naturopathy course is accepted by the major professional associations in New Zealand, and two associations have accredited the course.

##### **NZQA Panel Comments (2006:7)**

#### **4.1 Stakeholders, including relevant academic, industrial, professional and other communities, are identified.**

Stakeholders have been identified, and an Advisory Committee established. The group has met at least once and includes two people from the profession and 6 with commercial interests, but there is no academic from another institution on the advisory group.

**It is recommended** that an external academic be included on the Advisory Committee. There was some confusion regarding the relationship between the Advisory Committee for the proposed degree programme and other consultancy groups. Some of the stakeholders listed for the consultancy groups did not believe that they had in fact been fully consulted. As a result it is not entirely clear whether all the relevant stakeholders have been consulted.

#### **4.2 The actual or likely interests of these stakeholders in respect of the proposed course are clearly identified.**

The interests of those on the panel are closely identified with the College's aims, in that they want a degree programme for their profession. However the panel has no educational input.

#### **4.3 The interests of stakeholders have been appropriately addressed.**

The three advisory committee members interviewed by the panel were all professional stakeholders, were passionate about their subject area and the desire to have an integrated healthcare system. They had been to one meeting of the advisory committee.

#### **4.4 The course is likely to be acceptable to the relevant wider communities: academic, professional, industrial, Māori and other communities.**

Ngati Whatua has given their support. The professional and industrial communities support a degree programme.

The criterion has been met.

#### **4.5 Where appropriate, the course is cognisant of Māori tribal tikanga, reo and**

*traditions and is acceptable to Māori as a reflection of their aspirations for quality learning and standards in accordance with te reo me ona tikanga.*

A Maori adviser has been appointed to guide the programme.

### **Consultant's Review – Acceptability of the Course and Stakeholder Consultation**

The section of the Application which outlines the consultation process (section 7) would benefit from restructuring (use of sub-headings) and the inclusion of a list of chronological events to enable the reader to quickly grasp the chain of events. It appears that the Advisory Committee was set up rather late in the process, and consists mainly of professionals in natural therapy practice.

The lack of input from educationalists with experience in bachelor degree curriculum design and in teaching at bachelor degree level is evident in the consultation process and in the curriculum set out in the original Application. Appointment of external academics to the Advisory Committee would benefit the College and the curriculum by bringing fresh perspectives to the development and the delivery of the new course. It would establish a communication process between the College and the wider academic community, facilitate an inflow of experience and information to the College, support a two-way flow of information between institutions, and help to break down institutional barriers in education.

### **Recommendations – Acceptability of the Course and Stakeholder Consultation**

That section seven of the Application be restructured and a brief chronological outline included of the steps taken in the development and consultation process.

That the membership of the Advisory Committee be revised to include at least two external academics, including one with experience in bachelor degree curriculum design and one with extensive teaching experience at bachelor degree level.

## **5.0 Regulations Governing the Course**

Course regulations are generally adequate but the panel noted a number of points.

### **NZQA Panel Comments (2006:7)**

**5.1** *General and course-specific regulations are clear, comprehensive and fair and cover, where appropriate:*

General and course regulations are for the main part adequate for the course as it currently stands. The course regulations may need to be reviewed after the re-write of the course.

*Requirements for admission to the organisation and to the course;*

Entry requirements need to be revised, as it is desirable that students some have background in chemistry or science, at least to Level 3. Mature students may not have it and should be made aware of the need. The IELTS score was too low compared to similar areas. The IELTS score should be 6.5 with a minimum band of 6.

**It is recommended** that the entry requirements be reviewed to include a science background and to set the IELTS requirement at 6.5 with a minimum band of 6.

*Provisions for the awarding of credit towards a qualification or exemptions from specific course requirements as a result of cross crediting (from another course within the organisation), credit transfer (from a course awarded by another organisation) or*

*recognition of prior learning (credit awarded for informal or uncertificated learning);*

The bridging and transition arrangements from the diploma into the degree programme were over generous with only 60 more credits required for diplomates to complete the degree programme. This issue needs to be re-investigated. It was unclear as to whether Wellpark wishes to cross-credit from other institutions. This policy needs to be clarified.

**It is recommended** that Wellpark review the bridging, transition and cross-crediting arrangements for the degree.

*Course structure, including specified pre- and co-requisites, mandatory and optional/elective components, practical/work-based components and alternative entry and exit points;*

The contact hours appear to be high for a degree programme and the progression towards self-directed learning is not clear. The arrangement for the inclusion of the AUT papers into the programme needs to be clarified and strengthened. There do not appear to be any pre-requisites for clinical practice.

The issues raised in regard to this criterion should be dealt with under Requirement 1.

*Normal progress through the course and minimum and maximum periods for completion of the course;*

Six years for the completion of the programme was acceptable although panel members tended to think that it was too short so students could be disadvantaged.

*Assessment, including provisions for assessment in te reo Māori, reassessment and appeals;*

The provision for assessment in te reo Māori, re-sits and the appeals process are clearly documented.

*Provisions for dealing with instances of impaired performance (eg aegrotat passes);*

This was not clear, although there are opportunities for re-sits.

*Requirements for the award of the qualification;*

This was clearly stated as being the completion of all courses.

*Rules and criteria governing any awarding of merit, distinction, honours or other grades.*

The margins between merit and distinction made it quite easy to pass with distinction. This needs to be reviewed under Requirement 1.

### **Consultant's Review – Regulations Governing the Course**

The response to the Panel's concerns is set out below.

1. The need to review the regulations in light of the revised bachelor degree curriculum: this has been noted by the College.
2. The lack of chemistry as a pre-requisite for enrolment – the revised Bachelor of Naturopathy now contains a chemistry subject in first semester.
3. The low English language requirement for international students – universities are beginning to raise the IELTS requirements for students enrolled in health science courses to 6.5. The College intends to raise the IELTS requirement as recommended by the Panel.
4. The need to review bridging, transition and cross-crediting arrangements for students enrolled in the Diploma of Naturopathy – the College has noted this problem and has

decided that students enrolled in the Diploma will not be able to transfer directly into the new bachelor degree program. Those students will need to complete the Dip. Naturopathy and apply later (if they wish) to complete a bachelor degree conversion program.

5. High face-to-face teaching hours – this has arisen as a consequence of delivering naturopathy and its modalities (nutrition, herbal medicine, homeopathy, lifestyle counselling and massage) in a three year rather than four year program, and also of the traditional vocational learning and teaching strategy. The College may be able to reduce its weekly contact hours slightly as the course is revised.
6. Lack of clarity regarding arrangements with Auckland University of Technology to provide some of the bachelor degree subjects – the College aims to negotiate a Memorandum of Understanding with AUT.
7. Lack of prerequisites for clinical practice subjects – this has been rectified in the revised Bachelor of Naturopathy curriculum.
8. The limit of six years for completion of the course – this is to some extent due to government requirements for completions with a reasonable time frame. However it may disadvantage part-time students who encounter obstacles such as health or financial crises and may need to defer for at least one year.
9. Mechanisms for dealing with students claiming impaired performance – the Panel required clarification of the current processes and this will be done in the revised Application.
10. Narrow margins between awards for merit and distinction – this has been rectified by reducing the pass mark to 50% but a suitable grading system now needs to be put in place.

#### Recommendations – Regulations Governing the Course

That a grading system be devised appropriate to a bachelor degree with a pass mark of 50%

That a conversion programme be developed to enable practitioners holding a Diploma of Naturopathy to upgrade their qualification to a bachelor degree

That the limit of six years for completion of the course be extended to seven years to enable those undertaking part time study to defer for one year.

### 6.0 Resources

**The capacity of the organisation to support sustained delivery of the course, in all delivery modes, with regard to appropriate academic staffing, teaching facilities, physical resources and support services**

The Panel noted that, for the most part, resources were adequate to support the diploma programmes. However, some significant concerns were raised with regard to resourcing a bachelor degree.

#### NZQA Panel Comments (2006:9-12)

**6.1** *The Education Act 1989 defines a degree as an award that recognises the completion of a course of advanced learning that is taught mainly by people engaged in research. Collectively, the academic staff involved in the course:*

*a are adequate in number and appropriately qualified for the outcomes of the course to be met;*

There would appear to be an adequate number of staff for the diploma, but the number will not convert exactly for the degree programme as preparation for the new courses and a time allowance for research will need to be incorporated into staff workloads. This

will mean that some staff will have to have less contact time, so more staff will be needed. A workload formula needs to be developed and consequently the staff contracts will need to be revised.

Currently the face-to-face teaching load is high. Many of the staff are contracted to deliver their subject only and many of these people run their own clinics. While it is valuable for the college to have current practitioners, it also needs a bigger core of permanent staff who can take responsibility for the degree programme.

Not all staff are adequately qualified although one or two are working towards a higher qualification.

*b are engaged in research;*

It appeared that no staff are currently engaged in research in Naturopathy and Herbal Medicine, although at least two are research capable and several others are keen. Wellpark might consider finding an academic mentor from a degree providing institution with a similar qualification. This should be considered under Requirements 2 and 5.

*c have experience and expertise in teaching, with regard to the proposed delivery modes; and*

Most are experienced teachers but more in vocational training than higher education. The staff interviewed did not consider that there would be major changes to their teaching style with a degree programme, apart from an emphasis on critical thinking and apparently more assessments.

The College needs to address staffing resources, contractual arrangements for staff, and a workload formula to ensure that time is allowed for research, qualification upgrades and professional development. These should be incorporated into the plan requested in Requirement 2.

*d in the case of courses with research components, have experience and expertise in the supervision of research at the appropriate level.*

N/A

*Standards b-d will not necessarily be equally met by each member of academic staff. The expectation is that a collective view of the staff will acknowledge complementary contributions to meeting the standard.*

*In the case of courses with practical, field or work based components, the roles and responsibilities of the supervisory staff and the institution are formalised.*

There was only one clinical supervisor. The roles and responsibilities are clear but it is impossible for one person to adequately supervise a group of students with clients and to manage the clinic as well. Having only one supervisor means a limited perspective for students and a high workload for the supervisor.

Wellpark needs to review the staffing for clinical supervision with consideration being given to the appointment of at least one additional staff member. This should be considered under Requirement 2.

In some situations experience in Māori language and culture, and appropriate knowledge, skills and tikanga will also be necessary.

The College has appointed a Māori advisor who has a Diploma in Naturopathy. There is an inherent respect for other cultures.

*Additional staffing needs are identified where necessary and detailed recruitment and or staff development plans appropriate to the course implementation timetable are in place.*

Limited funds are available for additional staffing, but there was no obvious recruitment policy.

**Wellpark is required** to develop a comprehensive plan for the staffing of the degree.

**6.2** *The organisation has clearly identified the range of teaching facilities and physical resources, including library facilities, necessary for the implementation and sustained delivery of the course, in all proposed modes of delivery, and*

- a put in place the necessary teaching facilities and physical resources, or  
 b established detailed development and acquisition schedules appropriate to the course implementation timetable.

There are resourcing issues. While current facilities are very pleasant, only full-time academics have their own offices and tutors are cramped into a very small space. Access to databases is difficult and computer access for both staff and students is limited.

Laboratory facilities are also lacking, but Wellpark is undergoing negotiations with AUT for the use of one of their laboratories.

**Wellpark has a very good dispensary on site, but panel members were concerned to hear that it might be removed. They considered it an important teaching resource, which would also be valuable at the clinic.**

The library is the main concern as it is very small and barely useable, it does not have a trained librarian and the students are not permitted to take out books. They can use them for limited time at one of the two desks available for students. There are plans to extend the library, but it will still be too small. Wellpark has a small but good collection of very specific texts, but the collection needs to be bigger and broader. A major review has been carried out by a library consultant, and this should help with electronic access and access to journals, but overall the plan is inadequate for degree programme.

**Wellpark is required** to enhance and sustain the library and to provide access to library resources so that the degree programme is adequately supported.

**6.3** *There is a sufficient number of appropriately qualified and/or experienced support staff for the outcomes of the course to be met.*

The current three full-time support staff were applauded for their work by students and others, but they did not think that their workload would increase if they were to be supporting a degree programme. The panel however considered that the group would be very vulnerable if one of them were to leave and that their workload would indeed increase with a degree programme.

This issue needs to be considered under Requirement 2 or 4.

**6.4** *Adequate and appropriate course information and guidance and support systems are accessible to students.*

The Prospectus and Student handbook are informative, but students found the library and its no-lending policy inadequate and the lack of computers for student use, a definite disadvantage. Students felt well supported by the College, by each other and the academic and support staff.

The issues above need to be addressed under Requirements 4 and 5.

**6.5** *The organisation's financial infrastructure, administrative systems and resource management practices are adequate to support implementation and sustained delivery of the course.*

The panel were given a copy of the College's financial statements. It would appear that on paper, the College is sufficiently financially robust to support the degree programme. However, the library upgrade, creating more office space, making arrangements for the use of laboratories and funding for research will all be expensive exercises, which will require ongoing financial input.

**The panel requires** a comprehensive long-term business plan, including capital and operational requirements, for the further development and delivery of the degree.

**6.6** *The organisation's quality management system incorporates structured processes associated with an Academic Board or equivalent (with delegations to faculty or programme committees as appropriate).*

The structure is acceptable although there was some concern about objectivity with the close relationship between the Prema Trust and the Board of Directors, who are for the main part, the same people. They are also members of the Academic Board although



that includes the faculty heads as well.

The criterion is met.

### Consultant's Review – Resourcing a Bachelor Degree Course

The College has already responded to several of the above issues, including extension and refurbishment of the library which is underway. Issues discussed below are the academic staff profile, development of a research culture, and professional development.

#### Staff Profile

The Panel noted the need to increase the number of permanent staff and ensure they are appropriately qualified to teach in the bachelor degree programme. As a minimum this would require that academic staff have, or be enrolled in, a master's degree or a component thereof – a postgraduate diploma. (Postgraduate certificates are generally more vocational in orientation, for example extending skills in a clinical area. If a staff member chooses a postgraduate certificate it should ideally be nested within a master's programme).

For casual academic staff the high cost of postgraduate education is generally out of scale with the small remuneration they receive from limited teaching hours. Academic staff generally need incentives to undertake postgraduate study and these may include adequate and continuing employment; a financial contribution towards the cost of postgraduate study; a performance review that encompasses and supports goals in professional development, research and postgraduate education; a workload that incorporates research time; and a career pathway in higher education and research.

Approval of a bachelor degree programme will require a higher workload in non-teaching areas such as coordination of the course and individual subjects; planning, development and review processes; professional development commitments; and participation in academic committees.

Attracting the right staff requires an appropriate recruitment policy and the College's policy (QMS 2007:22) could be improved to broaden the pool of qualified and talented applicants. The mode of advertising for academic positions could move beyond the local area to include national and international advertising, and interview panels should have more than one person for permanent academic positions. The aim of the policy should be to attract high quality applicants with appropriate qualifications and experience, to avoid bias or partiality, and to bring fresh perspectives into the College.

All staff teaching naturopathic subjects should be eligible to join one of the key professional associations.

Clinical supervisors should be registered naturopaths and have a minimum of five years experience in practice, and clinical tutors at least three years.

#### Professional development

Teaching in a bachelor degree programme will require that professional development be offered to the academic staff in areas such as:

- learning and teaching methodologies
- assessment strategies and requirements
- information literacy
- problem based learning
- working with small groups
- curriculum and assessment coordination, design, coherence and review, and
- research training.

Most universities have academic development units which regularly provide seminars to their teaching staff to improve the quality of learning and teaching, and support beginning researchers. Wellpark College may be able to make arrangements for its academic staff to attend seminars and workshops at a local university for professional development purposes. Another option would be to

employ external academics with expertise in learning and teaching and research to provide similar seminars at the College.

#### **Recommendations – Resourcing a Bachelor Degree Course**

That the number of permanent academic staff be increased (part-time and full-time)

That a workload formula be developed that identifies and incorporates time for non-teaching responsibilities

That a system of performance review for academic staff be established that supports and rewards professional development, postgraduate study and research

That the system of funding for the professional development of academic staff be reviewed and extended to include learning and teaching, and research training.

That the recruitment policy be reviewed

That the Research Committee develops a discussion paper on research strategies and that the academic staff have the opportunity to respond

That Wellpark College aims to focus research in a specific area, develop a Research Centre, and encourage staff to do research in that key area to build expertise

That research partnerships with universities and other suitable institutions be explored

That a professional development strategy for academic staff be developed.

#### *7. Evaluation and review*

**The adequacy and effectiveness of the provision for evaluation and review of courses: for monitoring the on-going relevance of learning outcomes, course delivery and course standards; for reviewing course regulations and content; for monitoring improvement following evaluation and review; and for determining whether the course shall continue to be offered.**

Wellpark College has developed a comprehensive Quality Management System (2007) which describes the quality management structures and processes (sections 2 and 3), internal review processes (section 4), response to the Treaty of Waitangi (section 5), business planning and financial management (section 6), personnel policies (section 7) including recruitment (7.3), performance review (7.6) and professional development (7.7), resources (section 8, including financial, administrative, physical and planning), course regulations (section 9 including student welfare and complaints), the development, delivery and review of programmes (section 10), assessment policy (section 11), academic requirements including moderation and appeals (section 12), feedback to students (section 13), and research policy (section 14). All sections contain provision for evaluation and review.

Three organisational groups have oversight of the Bachelor of Naturopathy curriculum and its review.

**The Academic Board** (QMS section 3.3) has the following major role: “the prime function of the Academic Board is to set the academic policies of the College, coordinate the development and approval of new courses/ programmes, manage all aspects of course/programme delivery and to fulfil a broad quality assurance and continuous improvement function”. The key members in terms of quality assurance are the Principal, Assistant Principal, and the four Heads of Faculty.

**The Naturopathy, Herbal Medicine and Aromatherapy Advisory Committee** has now replaced the original Advisory Council (Application Appendices 2006:156). Membership of the committee

includes practitioners, 'graduate students', a professional association representative and the clinic supervisor (QMS 2007 section 3.5). The terms of reference for the committee are:

- To strengthen links between the College and members of the profession.
- To monitor the quality of the range of the College's programmes for the Naturopathy Faculty through receiving reports on student achievement.
- To advise on the ongoing development of the curriculum so that the programme remains current and at the leading edge of natural therapies education.
- To advise on the content of any related courses of study that will meet the ongoing professional development needs of graduates of the modalities represented.
- To provide information and advice on career paths and employment opportunities for graduates.

**The Advisory Group to the Bachelor of Naturopathy and Herbal Medicine** (Application Appendices 2006:67-8) was set up to advise on a range of matters relevant to the new curriculum including its ongoing development and monitoring the quality of the programme through receiving reports on student achievement. Members of this group who have educational experience include four natural medicine practitioners, a GP, a representative of a professional association, and the Principal and Head of Faculty as ex officio members.

Collectively, information and data for evaluation is sourced from summaries of student evaluation, internal reports, external reviews and audits, and monitoring of the quality of the Colleges' programmes.

The Panel noted that the QMS will require review to address the additional requirements related to delivery of a bachelor degree course.

#### **NZQA Panel Comments (2006:12-13)**

**7.1** *There is an effective system for the regular monitoring, evaluation and review of courses such that the course approval and accreditation criteria and requirements continue to be met. The system includes structured processes, associated with the academic board (or equivalent), for ensuring that the views of learners and representatives of relevant industries, professions, academic and research communities, Māori and other stakeholders are taken into account.*

The policies and procedures for the evaluation and review of courses are included in the QMS. As a degree programme, the New Zealand Qualifications Authority will appoint a monitor. The review process needs to include more than one external stakeholder.

**7.2** *Changes to approved courses are managed consistently with external requirements.*

The policies and procedures in the QMS are indicative only in regard to the degree. It is understood that the QMS will be re-written to incorporate degree requirements.

#### **Consultant's Review – Evaluation and Review**

It is not clear that two separate advisory groups are required to contribute to ongoing evaluation and review of the revised Bachelor of Naturopathy. Perhaps some consideration of the purpose and structure of these groups and their membership could be undertaken.

Although the members of the advisory committees would be well-placed to advise on the current state of the profession and the broad scope of its educational requirements, remaining at the leading edge of natural therapies education mandates that some members have the ability to advise on the more academic aspects of educational quality and review for a bachelor degree. If the naturopathy advisory committees are to have a meaningful role in the area of education quality it would be helpful if the membership could include at least one academic with experience in curriculum issues.

Given the amount of work required for the ongoing maintenance of a bachelor degree curriculum, the College may wish to explore setting up an internal Academic Committee which contains academic staff members and at least one external academic with expertise in curriculum quality issues. This committee would report directly to the Academic Board. Another external academic could participate in the external advisory committee, also providing input on education quality issues.

Another possibility is to expand the Academic Board with external academics. However the College structures its Board and committees, at least two external academics should be involved.

The term 'graduate student' in the membership of the Advisory Committee is not clear and should indicate either a current student or a recent graduate.

#### Recommendations – Evaluation and Review

That the College consider restructuring its academic and advisory bodies and their membership with a view to including external academics with expertise in quality issues for bachelor degrees

That the term 'graduate student' be clarified in the membership of the Advisory Committees

### 8.0 Research

**The adequacy of provision of research facilities and support of staff involved in research, the levels of research activity of staff involved in the course and of ways by which the research-teaching links are made in the curriculum.**

Staff teaching in a bachelor degree course are expected to be conducting research within their area of expertise, and the institution's research output should be consistent with an ongoing research culture. The institution is expected to provide appropriate support to research staff in terms of funding and infrastructure.

Wellpark College currently supports research by:

- ensuring that research based teaching and learning will be integrated into the College's courses (TEC Profile 2007-2009:9)
- development of degree courses that include more emphasis on research (TEC Profile 2007-2009:9)
- provision of two scholarships for staff wishing to undertake postgraduate study
- establishment of the Research and Ethics Committee in 2006
- developing the Research Plan 2006 – 2007
- appointing Dr V Srinivasamuthy to the role of Research Leader in 2007
- providing financial assistance for staff presenting papers at conferences
- carrying out an audit to establish the level of staff research experience
- approaching selected companies to explore research collaboration
- approaching other education institutions re possible collaboration in research projects.

The Research Committee has done some preliminary work to investigate resources within the College, including the research capabilities of staff.

The Research Centre Development Plan 2003 (Application 2006, Appendix 5) and identified four key components of a research strategy: (i) development of a Natural Therapy Research Centre, (ii)

development of research and scholarship in the College and appointment of a research leader, (iii) development of collaborative research, and (iv) development of a strategic research direction.

A short-term plan was subsequently developed (Research Plan 2006-7 – Application 2006, Appendix 5). This plan identified staff capability, resources and infrastructure as three key factors essential for research development. Training for staff to build research skills was identified as an immediate need, and resourcing issues of concern included the need to improve the library, development of partnerships with other organisations, location of funding sources, and the funding of research time for staff.

Preliminary steps have been undertaken by the College but the Panel noted that additional support and infrastructure must be put in place to underpin development of the long-term research strategy that the College must develop to establish a research culture.

#### **NZQA Panel Comments (2006:12-13)**

**8.1** *Staff conduct research within their area of experience which advances knowledge and understanding and supports their function as teachers.*

*Research, by the staff to be involved in the degree programme, is not under way as yet.*

**8.2** *The quantity and quality of staff research outputs are monitored and the collective output is consistent with the development and maintenance of an on-going research culture in support of the course.*

An audit, instigated by the College, showed that research experience is very limited and involves very few staff members. The college is looking to collaborative approaches and has approached selected companies with this in mind.

**8.3** *Organisational systems and facilities provide appropriate support to staff involved in research, including access to an appropriate ethics committee.*

The College has developed a research plan, established a Research and Ethics Committee with an external chairperson and appointed a Research Leader. This is a positive start to developing a research culture, but research support, such as a workload formula, improved library and study facilities, needs to be put in place for research to begin and a research culture to develop.

**Wellpark is required** to develop a comprehensive long-term plan for the development of a research culture to support the degree programme.

#### **Consultant's Review - Research**

*It could be argued that there is a degree of flexibility with regard to the definition of research. For example, academic staff are expected to be experts in their field and a normal part of their work is to regularly survey published literature (journal articles in particular) to remain current and provide evidence based teaching. This is a basic form of research activity and will help to establish a research culture, but by itself is not adequate to demonstrate a research culture.*

*Scholarship also plays a role and scholarly activities include contributing to important debates in the field through reading, writing, conference presentations and publications.*

*Staff will be required to participate in research projects, either through enrolment in a postgraduate research courses or other research projects.*

The development of research is a priority area for the College as outlined in the College Charter, and for the profession as the research output from New Zealand's naturopathic profession is low. Although no research is currently under way at the College, a number of staff already have or are enrolled in postgraduate qualifications and there is interest in research projects. The College is aware that developing a research culture is a gradual process. Consequently collaborative partnerships with experienced researchers are seen as the most appropriate way forward.

The proposed development of a Natural Therapy Research Centre and identification of key research strategies is commended. If this can be achieved, staff could be encouraged to

participate in the key research area(s) which would build expertise both in research methods and in the key research area.

A basic need in establishing a research culture is to get both staff and students excited about research per se, and to express positive feelings and ideas about the potential for Wellpark to become a key research centre for natural therapies. For a small college it is essential to be very strategic in developing the research plan so that available resources (financial and human) can be well targeted.

Building a research culture takes time. Problems exist in many university departments with high demands for research but insufficient funding to support staff to carry it out. Careful strategic thinking is required to develop a plan that will be affordable and sustainable, generating results over the long term. It is assumed that some progress has now been made on development of a strategic long-term research plan which will identify specific goals and how to achieve them. These goals should primarily address development of a research culture at Wellpark College, and also development of a research strategy / research centre. Some of the strategies suggested below may already have been considered or instituted.

#### *Planning*

- Continue to refine the strategic research plan. Develop specific goals and time-frames that will lead to achievement of goals.
- Develop expertise in low cost research methods such as qualitative research and surveys.
- Develop staff recruitment policies and strategies that will attract research-ready staff.
- Identify key categories of research that will form the nucleus of expertise in the research centre.

#### *Involvement of staff*

- Engage staff in generating ideas, developing the research plan and achieving its goals. Staff need to have 'ownership' of the research strategy to ensure they will participate actively in future projects.
- Research in naturopathic education could become a key research area if a majority of staff are passionate about learning and teaching issues relevant to naturopathy.
- The Research Committee could develop a discussion paper and circulate it within the College to seek staff feedback on important issues such as the identification of a key research area, establishment of a research centre, the development of research partnerships with other institutions, funding and resource requirements.
- Continue to provide financial support for professional development related to research – training, postgraduate education, conference attendance, etc.
- Reward staff for achievements such as qualifications, publications and conference presentations.

#### *Research training*

- Professional development for staff to ensure all have (i) the basic skills to regularly survey the literature in their field and incorporate valid findings into their teaching, (ii) training in research methodologies as appropriate.

#### *Resourcing*

- Identify existing resources, for example the student clinic and its clients and database, and the student body.
- Time for research (including training and development work) to be incorporated into academic staff's workload plans on an individual basis.

- Clinical research – if this is under consideration explore how to utilise the student clinic, for example by establishing specialist clinic(s) in areas where natural therapies already demonstrate benefits. Expert practitioners could be invited to conduct these clinics and to participate in research.

#### *Funding and partnerships*

- Identify sources of partnerships and funding – for example universities (who are more likely to provide resources than funding, at least in the early stages of a partnership), the naturopathic profession and associated industry (for example, manufacturers/suppliers may be willing to add a small amount to each invoice to raise research funds), general fundraising activities (a professional fundraiser might be consulted or students may contribute ideas), bequests, philanthropic organisations, and public donations.

#### *Evaluation of progress*

Evidence of progress towards research goals should be continuously collected, including:

- Long term strategic research plan
- Staff workload plans
- The meeting of goals in research strategies
- Improved library and study facilities for students and staff
- Funds raised
- Partnerships formalised
- Minutes of Research Committee meetings
- Annual report of research progress
- Publications and conference presentations

#### **Recommendations – Research**

That academic staff be involved in creating the research strategy and infrastructure

That academic staff who wish to become research active be allocated time for research activities including training, planning and development

That low cost research methods be utilised and staff expertise be further developed in these methods

That attempts to build strategic research partnerships continue

That potential funding sources be identified and actively pursued

That research goals be identified and continuously monitored

That staff recruitment policies and strategies be developed that will attract research-ready staff.

## Appendix 8. Wellpark College Business Plan

*Financial Projections (adjusted to accommodate delivery of an undergraduate degree in Naturopathy)*

### Introduction:

At present the College is working off its current profile. This profile was developed in 2006 and outlines the programme development and other goals for 2006 – 2009. In 2007 the Government has decided that tertiary institutions will be switch to an investment planning process, rather than utilise Charters and Profiles. Smaller tertiary institutions such as ourselves will be submitting a plan in 2008, so our guidance still comes from the goals listed in the profile. (NB. A copy of selected sections of the Profile, with relevant portions to the degree development and delivery highlighted, is attached to the end of these financial projections for your information.) As the focus of this document is on the degree planning, the aspects relating to degree are highlighted in the projections. However, the financial projections as a whole are included in order for the panel to gain an understanding as to how the degree impacts on the total picture.

The development of a degree entails special aspects that are integral to the delivery of an undergraduate programme. This is guided by the need for students to be able to engage in education in a more self-directed environment than would be expected in lower level diploma or certificate programmes. The impact on the business plan expenditure covers four major areas:

1. Staffing:
  - having staff engaged in research
  - in general utilising more highly qualified staff (which will mean having staff on higher grades in terms of pay and conditions)
  - creating the environment (in terms of workspace and resources) for staff to realise their full potential
2. Library:
  - Offering students and staff access to library facilities that underpin and support their learning in a self-directed environment
  - Ensuring support services available in the library
3. Curriculum & Course Development:
  - Ensuring staff are given time and resources to ensure curriculum and course development is informed by research and best practice
4. Professional Development
  - Ensuring tutorial and academic support staff have meaningful professional development programmes that they can be engaged in.
5. Other Resources

Where these areas are covered in the financial projections, these are indicated by their numbers and footnotes to clearly identify those funds allocated to the development and delivery of the programme.



## Appendix 8a Summary of Financial Projections

### Analysis of 2003 - 2006 financial information

	2003	2004	2005	2006
domestic fees	987041	823136	806094	878132
international fees	1118664	936342	893442	989766
<b>student fees</b>	253874	296735	258093	286976
govt grants	56172	35674	46940	78427
other income				
sundry income				
<b>income</b>	<b>2415751</b>	<b>2091887</b>	<b>2004569</b>	<b>2233301</b>
admin	593893	646756	688928	748687
admin s&w	672989	541480	548002	546931
<b>admin exps</b>	1266882	1188236	1236930	1295618
contract tutors	156009	201573	64141	55002
tutor s&w	570232	417803	437464	473873
other dept exps	24224	35363	26197	23920
<b>fac exps</b>	750465	654739	527802	552795
other costs	151500	166866	155366	164848
<b>exps</b>	<b>2168847</b>	<b>2009841</b>	<b>1920097</b>	<b>2013261</b>
<b>surplus</b>	<b>246904</b>	<b>820456</b>	<b>84472</b>	<b>220040</b>

\*\*\*\*

2007 surplus used for capex - \$30000  
 2008 surplus used for capex - \$30000  
 2009 surplus used for capex - \$60000

### Forecast 2008 - 2010

	2007	2008	2009	2010
domestic fees	677000	717750	756500	796250
international fees	228000	243125	258700	284200
<b>student fees</b>	905000	960875	1015200	1080450
govt grants	1052257	1402500	1155600	1226500
other income	304500	316500	325300	334200
sundry income	39400	49200	44200	46200
<b>income</b>	<b>2301156</b>	<b>2423075</b>	<b>2540300</b>	<b>2687350</b>
admin	750656	797930	770070	743915
admin s&w	642597	663080	691260	725900
<b>admin exps</b>	1393253	1461010	1461330	1469815
contract tutors	60230	62800	65500	69000
tutor s&w	532478	596150	661900	693640
other dept exps	53324	55195	57135	59140
<b>fac exps</b>	646032	714145	784535	821780
other costs	202000	207050	212225	217530
<b>exps</b>	<b>2241285</b>	<b>2382205</b>	<b>2458090</b>	<b>2509125</b>
<b>surplus</b>	<b>59872</b>	<b>40870</b>	<b>82210</b>	<b>178225</b>

\*\*\*\*

1. Includes 50000  
 for degree  
 development  
 and delivery

Budget Details  
 1. Student Fees  
 November 2007

© Wellpark College of Natural Therapies

domestic rate \$  
domestic no

	2007	2008	2009	2010
<b>2. Govt Grants</b>				
domestic eftfs	179.00	185.00	190.00	195.00
international eftfs	23.90	25.00	26.00	28.00
<b>student eftfs</b>	<b>202.90</b>	<b>210.00</b>	<b>216.00</b>	<b>223.00</b>
<b>ave \$/eft</b>	5186.09	5250.00	5350.00	5500.00
<b>govt grants</b>	<b>1052257</b>	<b>1102500</b>	<b>1155600</b>	<b>1226500</b>

- used eftfs history to predict ensuing years  
8.65% 23 EFTS (approx) predicted for 1<sup>st</sup> degree intake 2007  
16.40% 2 EFTS predicted for 1<sup>st</sup> degree intake 2007  
9.57%

**3. Other Income**

- Book Sales
- Dispensary Sales
- Prema Clinic Income
- Short Course Fees
- Other Fees
- Other Income**

**4. Sundry Income**

- Interest Received
- Classroom Rental
- Locker Hire
- Photocopying
- Sundry Income**

	2007	2008	2009	2010
<b>5. Admin Expenses</b>				
ACC Levies	2400	5250	5470	5750
Accounting Fees	14000	14490	15000	15525
Advertising & Promotions	100000	80000	80000	80000
Admin Fees Public Trust	9000	9615	10225	10980
Bad Debts	4400	5000	5500	6000
Bank Charges	10250	10600	11000	11400
Cleaning and Laundry	20000	20700	21450	22200
Computer Expenses	17500	19250	18750	19400

63.81% taken as 0.43% of s&w  
10.52% 3.5% increase annually  
-25.00% reduced after 2007 then kept the same  
20.59% taken as 1% of fee income  
32.00% guestimate  
10.85% 3.5% increase annually  
10.63% 3.5% increase annually  
9.87% 10% increase in 2008 than back to

Released under the Official Information Act 1982

	23000	20000	20000	5000	-90.00%	3.5% annually
<b>Consultancy Fees</b>	60000	40000	20000	20000	-100.00%	3. Includes external consultants involved in degree development
<b>Course Development</b>	67200	65000	58500	52650	-22.38%	<b>Reduced 20000 per year until 2009</b>
Depreciation	6000	6000	6000	6000	0.00%	estimate
Donations	17300	17300	17300	17300	0.00%	kept the same
Equipment Hire	1500	3000	3105	3210	57.00%	should be the same as 5 yr agreement on photocopiers
Gardening	1200	1800	1800	1800	33.33%	3.5% increase annually
General Expenses	14040	14530	15050	15580	10.66%	kept the same after 2008 increase
Insurance	60	100	100	100	40.00%	3.5% increase annually
Interest - Bank	734	130	0	0	-69.46%	kept the same
Interest - Lease	4200	4350	4500	4700	11.49%	will clear in 2008 not anticipating new leases
Internet	1200	1500	1500	1500	20.00%	3.5% increase annually
Kitchen Supplies	3000	3105	3200	3300	9.66%	kept the same after 2008 increase
Legal	2400	2000	2000	2000	-20.00%	3.5% increase annually
Loss on Disp of Assets	1200	5000	7500	8000	126.00%	estimate
Mobile Clinic	1800	1950	2060	2300	25.64%	estimate
MOE Levies	12000	12420	12900	13350	10.87%	0.8% on international fees
Motor Vehicle Expenses	18000	45000	45000	25000	15.56%	3.5% increase annually
NZQA	14400	15120	16200	16200	11.90%	degree approval in 2008 & 2009
Office Supplies	4800	5040	5220	5400	11.90%	5% increase in 2008 thereafter 3.5%
Postage and Freight	18000	18650	19300	20000	10.72%	5% increase in 2008 thereafter 3.5%
Power and Water	30000	31500	32600	33750	11.90%	3.5% increase annually
Printing	2400	3000	3000	3000	12.00%	5% increase in 2008 thereafter 3.5%
Recruitment	151040	158590	158590	162560	7.26%	1. Includes expenses in recruiting staff for degree development and delivery
Rent - 6 Francis Street	15120	15650	16200	16800	10.73%	5% increase in 2008 then 2.5% increase in 2011
Rates - 6 Francis Street	29012	35100	36400	36400	41.71%	3.5% increase annually
Rent - Prema Clinic	0	20000	10000	10000	50.00%	no longer applicable
<b>Research &amp; Development</b>	36000	37260	38600	40000	10.74%	<b>1. 400 hours in 2008, 200hours in 2009/10</b>
R & M - General	4500	1550	1600	1660	10.32%	3.5% increase annually
Security Expenses	8400	10000	10000	10000	16.00%	3.5% increase annually
Staff Training	9600	15000	15000	15000	36.00%	kept the same after 2008 increase
Subscriptions	15600	16380	17000	17600	12.21%	kept the same after 2008 increase
Telephone and Tolls	2400	5000	3000	3000	12.00%	5% increase in 2008 thereafter 3.5%
Travel & Entertainment	750656	797930	770070	743915	-0.84%	3. Includes travel expenses involved in degree development and monitoring
<b>Total Expenses</b>						

6. Admin S&W		rate	hrs/week	2007	2008	2009	2010	
Student Administration	18.50	40.00	38480.00	39706.55	41394.08	43466.98	1. The student Administrator would have increased responsibilities due to delivery of degree	
Faculty Manager	25.00	34.00	44200.00	45608.88	47547.25	49928.29	1. The Faculty Manager would have increased responsibilities due to delivery of degree	
Assistant Principal	29.86	36.00	55897.92	57679.67	60131.05	63072.25		
Principal	49.76	40.00	103500.80	106799.89	111338.88	116914.43		
Marketing Administrator	14.50	32.00	24128.00	24897.08	25955.25	27254.97		
Weekend Security	15.00	4.00	3120.00	3219.45	3355.28	3524.35		
Reception	16.56	42.50	36597.60	37764.15	39069.12	41340.62		
Dispensary Assistant	15.00	26.00	20280.00	20926.43	21815.80	22908.27		
Cleaning Assistant	11.25	6.00	3510.00	3621.88	3775.81	3964.89		
Maintenance	17.00	40.00	35360.00	36487.10	38037.80	39942.63		
Gardener	15.00	20.00	15600.00	16077.25	16781.38	17621.75		
International Student Admin	19.00	35.00	34580.00	35682.24	37198.73	39061.54		
Accountant	25.00	40.00	52000.00	53657.50	55937.94	58739.16		
Student Support	16.50	40.00	34320.00	35413.95	36919.04	38767.85		
Dispensary Manager	19.00	21.00	20748.00	21409.34	22319.24	23436.93		
Administration Support	17.00	40.00	33360.00	36487.10	38037.80	39942.63		
Accounts Administrator	19.00	45.00	44460.00	45877.16	47826.94	50221.98		
Others			16119.00	16632.79	17339.69	18208.01		
<b>Total Admin S&amp;W</b>		<b>rounded</b>	<b>618261</b>	<b>637968</b>	<b>665082</b>	<b>698388</b>		