



IRISH MEDICAL  
ORGANISATION  
Ceardchumann Dochtúirí na hÉireann

Submission to HETAC and the Department of Health  
Review of Academic Programme Validation of Certain Complementary Therapies.

November 2012

## IMO Submission to HETAC and the Department of Health Review of Academic Programme Validation of Certain Complementary Therapies.

Since 2002, the IMO has been calling on the Government to regulate complementary/alternative practitioners and suppliers of complementary/alternative medicines and products.

Many people in Ireland use complementary/alternative therapies and remedies such as acupuncture, chiropractics, osteopathy, herbal and Chinese medicine, in the treatment of various illnesses and ailments despite the fact that the evidence base for many of these therapies is poor.

Quality of health care in Ireland is assured in part through independent statutory regulation of doctors, nurses and other allied health and social care professionals as well as the statutory regulation of medicines, medical devices and healthcare products. However complementary/alternative therapists and products are unregulated and pose significant risks to the health and safety of patients. While some therapies and remedies can be used safely alongside mainstream medical treatment, complementary products may react with other treatment or medication with negative affect on a patient's health. Worse again alternative therapists and advertisers of alternative products can often claim to cure specific illness and conditions without scientific or medical evidence to support that claim. Patients may choose to use alternative therapies instead of mainstream medical treatment, allowing their condition to worsen and in some cases leading to early death.

The Commission on Patient Safety and Quality Assurance in 2008 recommended that "other non-medically trained practitioners in alternative medicine whose treatments may be unsafe or potentially hazardous to patients should be considered by the Department of Health and Children for some type of regulation."

The IMO recommends the establishment of a statutory body to regulate complementary/alternative therapies which would set professional standards of practice, education, training and ongoing competence of providers of complementary/alternative therapies. The statutory body would be responsible for assuring that processes are in place to assure that professional standards are met and to investigate complaints.

Internationally acceptable national qualifications frameworks will be required to enable regulation of complementary/alternative therapies. The IMO supports the conclusions of the INTERNATIONAL REVIEW OF THE ACADEMIC VALIDATION OF HIGHER EDUCATION PROGRAMMES IN THE COMPLEMENTARY THERAPIES (Report to HETAC and the Department of Health 2012) in relation to expertise criteria for national qualifications frameworks. For the protection and safety of service users we strongly endorse the need identified in the review for "The establishment of legitimate expertise...which is expressed in published practice standards which...are based on evidence of efficacy of practice".