

## Response template for the public consultation on the proposed change to the protected title for the podiatry speciality of podiatric surgery

September 2024

This response template is the preferred way to submit your feedback to the public consultation on the Podiatry Board of Australia's proposed change to the protected title for the podiatry specialty of podiatric surgery.

Please provide any feedback in this document, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

### **Making a submission**

Please complete this response template and email to [podiatryconsultation@ahpra.gov.au](mailto:podiatryconsultation@ahpra.gov.au).

**Consultation closes on 8 November 2024.**

### **Publication of submissions**

The Board publishes submissions at its discretion. The Board generally publishes submissions on its website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we will remove personally identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them, and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence.

Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

**Published submissions will include the names of the individuals and/or the organisations that made them, unless confidentiality is requested.**

## Initial questions

*To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.*

### Question A

Are you completing this submission on behalf of an organisation or as an individual?

#### Your answer:

Organisation

Name of organisation: Royal College of Podiatry

Contact email: lawrence.ambrose@rcpod.org.uk

Myself

Name: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

### Question B

If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

A member of the public?

Other: [Click or tap here to enter text.](#)

### Question C

Would you like your submission to be published?

Yes, publish my submission **with** my name/organisation name

Yes, publish my submission **without** my name/ organisation name

No – **do not** publish my submission

## Your responses to the consultation questions

### 1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

- No. The title podiatric surgeon is protected for a reason, and that is because it is the best descriptor of what podiatric surgeons are and what they do.
- The term podiatric surgeon is an international term used in the United States and the United Kingdom.
- Anaesthetists (specialist medical practitioners) have worked for decades with podiatric surgeons and have never expressed concern over the title, podiatric surgeon. This is because they are witnessing surgery, by specialist podiatric practitioners.
- If confusion exists, then it is best addressed by a public information campaign and by the practitioner providing appropriate information to the patient.
- Podiatric surgeon is appropriate, as an AHPRA approved course in podiatric surgery is completed before the title can be used.
- The term podiatric, is indicative of podiatry, whilst 'surgical' is a demotion from being a true surgeon.
- A title change, of the type suggested, is akin to a psychologist being called a counsellor, or a police officer, being called a security guard, when their respective training and occupational responsibilities are far more comprehensive.
- No country in the world has what are termed surgical podiatrists.

### 2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?

- International consistency in terminology is the one component of removing confusion, followed by consumer and stakeholder education.
- Orthopaedic Surgeon is a term used throughout the world. There are no Surgical Orthopaedists.
- A change of title is not likely to improve safety, which should be the focus. The Independent Review reported that podiatric surgeons are safe.

Alternative descriptors could be:

Podiatric Surgeon (Podiatrist Practicing Podiatric Surgery)

Podiatric Surgeon (Specialist Podiatrist)

Doctor of Podiatric Medicine (DPM) (Foot and Ankle Surgeon)\*

The alternatives suggested would be accompanied by a consumer and stakeholder information campaign to supplement understanding and remove confusion.

\*This is an appropriate title as Doctors of Podiatric Medicine (DPM) training programs are running, with more being established in Australia. American podiatrists are called Doctors of Podiatric Medicine (DPM's).

**3. What are the potential impacts for consumers of the proposed change in title?**

- Consumers may be confused that surgical podiatrists are not sufficiently trained in foot and ankle surgery to the level they require and desire.
- The consumer will be at a disadvantage because a surgical podiatrist will never receive parity in funding, via Medicare and private health insurance companies, for their surgery. Their out-of-pocket expenses for surgery will therefore be higher.
- The consumer will be disadvantaged because specialist podiatrists will not have parity with medical specialists, such as orthopaedic surgeons, which prevents equality in interprofessional relationships, which is better for patient outcomes.
- Consumers will be at a disadvantage because a surgical podiatrist will not be able to advocate for them, on the same level as an orthopaedic surgeon, even should the orthopaedic surgeon have no specific training in the foot, ankle and lower limb.
- A surgical podiatrist will have less status in foot and ankle surgery compared to all other surgical specialist fields, even though these other fields/practitioners may perform little foot and ankle surgery. This means the consumer may undertake surgery with another surgeon, who does not have the same level of experience in foot and ankle surgery, as the surgical podiatrist.
- Less diversity in health care provision, is not in the best interests of consumers, who are entitled to choice in health care provision.

**4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?**

- The impact of title change will be devastating to the field of podiatric surgery, as it will stymie full integration of this specialist field into the Australian health care model.
- It will stimulate an increase AHPRA notifications from orthopaedic surgeons against podiatric surgeons, because a surgical podiatrist will be perceived to be inferior to an orthopaedic surgeon, even an orthopaedic surgeon who has limited training in the foot and ankle.
- Medical dominance will stymie the progression of an entire profession field, that of podiatry/podiatric medicine in Australia, which is in contrast to the United Kingdom and the United States.
- Absence of an appropriate title will ensure podiatric surgeons continue to receive inadequate professional recognition, funding for services rendered and ongoing vulnerability to unfair litigation and scrutiny.

**5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?**

- Title change from podiatric surgeon to surgical podiatrist will remove a level of parity for the profession of podiatry, with medicine, whilst most individual medical doctors see the profession as collaborative and not subordinate.

- Title change creates more confusion for the consumer as it provides them with insecurity as to the level of training the practitioner has received, especially as there is no preface for the title anywhere in the word.
- Collaboration between orthopaedic surgeons and podiatric surgeons does happen around the world, based on the principles of mutual respect and on what is in the best interests of consumers/patients. This is the correct direction to take on this matter (change in title will likely impede this).
- There will be an unfair orthopaedic competitive advantage over podiatric surgeons – this is likely have significant financial implications, for podiatric surgeons.
- Title change demanded by the AOA is part of their plan to maintain a competitive advantage over podiatric surgery.
- The Australian Podiatry Board, which is independent from the Australian Medical Board, has its primary objective to ensure podiatric practitioners engage the public safely. Podiatric surgeons are safe and effective.
- Any confusion over title can be addressed by an appropriate media and information campaign. This is the less reactive and the best approach.