

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.

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Making a submission

Please complete this response template and email to podiatryconsultation@ahpra.gov.au.

Consultation closes on 8 November 2024.

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Question A

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

Your answer:

☐ Organisation

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

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

☒ Myself

Name: Burke Hugo

Contact email: [REDACTED]

Question B

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

☒ A registered health practitioner?

Profession: Podiatrist & Podiatric Surgeon

☐ 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?

I disagree with the proposal to change the protected title because Podiatric Surgeon is already recognised world wide as a term that describes podiatrists who performs surgery. A title change will not clarify our role, and will only add to more confusion while alienating Australia from the international Podiatric Surgery community. This will make Australia less attractive for skilled Podiatric Surgeons to move to Australia, which is what we need to help lift our profession. It will also make it more difficult for Podiatric Surgeons (with a different title) to visit other countries for training experience. If you consider the specialist title Orthodontist. Many people will not know that they are specialist dentists, and the term is very similar to Orthopaedic. The key is to educate the public via the Ahpra and Association websites, and for Podiatric Surgeons to be clear about their scope. I have not heard of any case involving a Podiatric Surgeon passing him/herself off as a Medical Surgeon. Many general podiatrists use the title Dr, with the expectation is that they do not pass themselves off as medical practitioners. Similarly, Podiatric Surgeons should be able to continue using that title with the expectation they do not pass themselves off as medical practitioners.

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?

Surgical Podiatrist = Podiatrist who performs surgery = Podiatric Surgeon. It is just a play on words that appeases the Orthopaedic and medical community in Australia and has nothing to do with protecting the public. The title Podiatric Surgeon should be maintained.

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

The creation of further confusion for consumers. It could lead to the public assuming all Podiatrists perform surgery to the level of what Podiatric Surgeons currently do. The title has existed in Australia for about 40 years. I do not believe that the proposed change in title will make the public any safer in regard to what Podiatric Surgeons do. Consumers may lose the option to choose a Podiatric Surgeon if the regulation and landscape, along with title change, makes the specialty unviable. The landscape will then be dominated by Orthopaedic Surgeons, who are ultimately driving these changes.

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

Potential Impacts: Alienation from the rest of the world where Podiatric Surgeon is a recognised term. Further confusion for the public. No change in perceived risks to the public. A loss of interest for podiatrists wishing to enter Podiatric Surgery programs due to a loss of status and perceived diminished career. The eventual closing of Podiatric Surgery programs. The loss of the specialty to Australia. We only have 42 podiatric surgeons and the landscape we work within is already very difficult and the morale at a record low. Changing the title this way could be the final nail in the coffin leading to the demise of our small speciality group.

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

Yes. I have already had podiatrists coming to me saying there were considering entering a Podiatric Surgery training program but have now changed their mind. The negative publicity relating to the Regulatory Review, and now the title change has led podiatrists to believe there is no future in Podiatric Surgery and therefore the costs and length of training are a bad investment. The inability to attract students into our Podiatric Surgery training programs will lead to the closure of the programs, and a national decline in numbers to the point where it will not be a viable specialty. Obtaining Professional Indemnity Insurance has become difficult due to the perceived increased risks (negative media, regulatory review, title change). The smaller the number of Pod Surgeons the higher the PI insurance costs due to a small premium pool, we may soon become uninsurable. There will also be a significant cost relating to changing legislation and insurance documentation across Australia.

In summary, a title change will not make the public any safer, lead to more confusion, alienate Australia from the international Podiatric Surgery community, contribute to the reduction in Podiatric Surgery students, and eventually reduce the specialty to such low numbers it becomes unviable and is lost to Australia.

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Your answer:

☐ Organisation

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

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

☒ Myself

Name: Christopher Jackson.

Contact email: [REDACTED]

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?

I disagree with the proposed change to the name. Similarly to dental practitioners all podiatrists are capable of performing a certain level of surgery after qualification from their initial podiatry degree. If the name was to be changed it would be confusing as the general public when requiring low level surgical intervention would then seek out a "surgical podiatrist" when in fact that is not necessary.

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?

Specialist foot surgeon, specialist podiatric surgeon

Much the same as surgery is performed by specialist hand surgeons / plastic surgeons when working on hands and not general orthopedic surgeons.

Those in this specialised field should be clearly identified between general podiatrists who perform minor surgeries.

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

The impact to those requiring minor surgery that a general podiatrist can perform includes confusion about the scope of their abilities, mistrust and general skepticism over what a podiatrist is capable of.

While in general all podiatric surgeons are also podiatrists there could be confusion about the services most provide if they are only operating in the surgical field

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

The potential impacts for current operating podiatric surgeons include changes to business names, titles, advertisements, registrations both professional and business.

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

If the title was to remain as podiatric surgeon, then there should be scope to include these surgeons as medical doctors performing specialist surgery, that is potentially outside the scope of general orthopedic surgeons

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☐ Organisation

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

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

☒ Myself

Name: [Joe Keain](#)

Contact email: [REDACTED]

Question B

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

☒ A registered health practitioner?

Profession: [Podiatrist](#)

☐ A member of the public?

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

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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, I do not agree with the proposal. Podiatric surgeons have dedicated years of study and practical experience to acquire a level of expertise in surgery that exceeds the typical training of general orthopedic surgeons in certain areas, particularly in foot and ankle care. The title of "podiatric surgeon" reflects this specialised expertise and the years of rigorous training and clinical practice that podiatric surgeons undergo. Rebranding the title to "surgical podiatrist" could undermine the distinction between podiatric surgeons and general podiatrists, potentially confusing patients and the public. Podiatric surgeons already have a defined and respected role in healthcare, and altering the title could cause unnecessary disruption to professional identities and patient trust.

- 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?**

I would recommend retaining the title "podiatric surgeon." This title already provides clarity to the public and other healthcare professionals regarding the level of expertise and the scope of practice. Podiatric surgeons are specialists in foot and ankle surgery, and the term "surgeon" is widely recognized and respected in healthcare systems. Keeping the current title avoids any potential confusion and maintains the strong identity and authority of podiatric surgeons, while making it clear to patients that they are receiving care from someone with advanced surgical training and knowledge.

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

For consumers, changing the title could lead to confusion and a lack of clarity regarding the specific qualifications of the practitioner. "Surgical podiatrist" could suggest that the individual is a general podiatrist with surgical capabilities, rather than a highly trained specialist in foot and ankle surgery. This change could cause patients to question the level of expertise of the practitioner, potentially undermining their confidence in seeking treatment. Additionally, patients who are accustomed to seeing a "podiatric surgeon" may not recognize that the qualifications and scope of practice have not changed, despite the new title.

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

The proposed change could have several negative impacts for podiatric surgeons. First, it could result in confusion among patients, as they may not fully understand the distinction between a podiatric surgeon and a general podiatrist. This could lead to a reduction in patient trust and, potentially, fewer referrals. In terms of costs, rebranding and implementing the new title would require significant resources for updating marketing materials, signage, websites, and professional documentation, which could create a financial burden for podiatric surgeons. Furthermore, the change could devalue the years of rigorous, specialised education and training that podiatric surgeons have completed to distinguish themselves from general podiatrists.

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

Yes, there are several unintended consequences that might arise from the proposed change of title. Firstly, it could create confusion among patients who may no longer recognize the difference between a general podiatrist and a podiatric surgeon, potentially leading to misinformed decisions about their care. This could also blur the line between different healthcare professions, causing complications in professional collaboration and the referral process. Additionally, the change could lead to legal and regulatory issues surrounding the protection and use of professional titles. Finally, it could harm the reputation of podiatric surgery as a specialised field by diluting the distinction between general podiatry and surgical expertise. The profession might experience a loss of credibility in the eyes of both patients and other healthcare providers, as the title no longer reflects the high level of specialisation that is characteristic of podiatric surgeons.

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

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

☒ 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: Consultant Podiatric surgeon

☐ A member of the public?

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

Question C

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

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

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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

Placing surgical in front of podiatrist, suggests that podiatric surgeons are working under direction. Surgical assistants are helper grades who have work delegated to them and they work within proscribed pathways. They are not trained to diagnose, determine surgical treatment plans or even take responsibility for surgical outcomes. Podiatric surgeons are not assistants but autonomous health care professionals whose contribution to health care is optimised by their independent status. For the public and other health care professionals to understand their status it is vital that podiatric surgeons have a title that acknowledges and reflects their status.

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?

Podiatric Surgeon or Podiatric foot and ankle surgeon

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

They will not understand that they are being treated by a specialist who can provide the full range of care for their foot and ankle condition.

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

Their contribution to national and indeed international health care will be diminished if they cannot maximise their role.

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

The medical profession should not be placed in a position to determine the future development of other health care professions. The medical profession will always resist encroachment on its scope of practice but in doing so it rations health care provision restricting the care that can be provided to the public. Health care systems will continue to recognise that health care requires the engagement of all health care professionals not utilising their skills will benefit only those who will profit from monopolising health care to the medical profession.

Change of title could lead to retrospective litigation as it will soon be realised that this change of title makes all podiatric surgeons vulnerable to charges of misleading patients.

Podiatric Surgeons will have to re negotiate their employment conditions.

Podiatric surgeons will have to re-negotiate their status with health care insurance providers

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

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

☒ Myself

Name: Andrew Kingsford

Contact email: [REDACTED]

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: Retired Podiatric Surgeon

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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?

The protected title for the podiatry specialty of podiatric surgery should not be changed. The title Podiatric Surgeon is currently used, and has been historically used for decades, in multiple countries internationally as well as in Australia. Changing the title would cause confusion for the public, for referring practitioners, and for professional interaction between practitioners and colleagues from different countries; as podiatric surgeon is the title utilised internationally. Having practiced as a registered podiatric surgeon for almost three decades and having been a previous State Podiatry Registration Board Chairperson, it was extremely rare for a patient to report having assumed that a podiatric surgeon was a registered medical practitioner. There are better ways of reducing any perceived confusion of the public without changing the internationally-recognised title of this podiatric specialty. The term for a practitioner performing surgery is "surgeon". The title 'surgical podiatrist' would be very confusing and unusual as such a term is not used elsewhere; for example, surgical veterinarian or surgical dentist.

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?

If the Podiatry Registration Board of Australia is convinced that Australian consumers require greater clarity, the words "Specialist Podiatrist" could be mandated to be appended in brackets after the title Podiatric Surgeon. This respondent however does not believe such perceived confusion is of sufficient magnitude to warrant this type of further clarification.

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

The Australian public, health consumers, State and Federal Governments, other health professionals across the country, and associated health industry personnel have known podiatric surgeons by this title for over three decades. Surgical podiatrist is an unfamiliar terminology which has the propensity of confusing health consumers (and others). Information for consumers is widely and easily accessible for anyone seeking clarification of the education, training, and scope of practice of podiatric surgeons in Australia and/or internationally.

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

The impacts of a change in title for podiatric surgeons are predominantly centred on confusion domestically and internationally. Consistent use of title across a profession globally is desirable. Potential costs incurred for podiatric surgeons following a title change would be relatively modest in dollar terms.

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

I believe the amount of confusion or misunderstanding of the public and health consumers as to the background, education and training of podiatric surgeons is negligible, and does not require a change of an internationally-recognised professional title. The addition of the words 'specialist podiatrist' would suffice in clarifying any confusion without the negative consequences of a title change.