

### 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 These details will not be published in any summary of the collated feedback from this consultation.*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: [Click or tap here to enter text.](#)

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

☒ Myself

[Redacted]

[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?

- 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.

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#### Question B

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Profession: Orthopaedic Surgery

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

#### Question C

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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. Inclusion of the term "surgical" implies to the public that the practitioner is a surgeon, in the sense of being medically trained, rather than being trained as a podiatrist.

I would suggest either "Operative podiatrist" or "Podiatric technician", both of which to a large extent, avoid the above confusion.

**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?**

Yes, I would suggest either "Operative podiatrist" or "Podiatric technician".

These names suggest the ability to intervene, but do not imply that the podiatrist is a medically trained practitioner or surgeon, in the public's understanding.

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

Patients (not consumers!) would still have the choice of practitioner, but are less likely to be confused about an individual practitioner's experience, background, or training, than is currently the case.

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

There is unlikely to be a significant impact on podiatrists with the proposed change in title to "Surgical podiatrist".

Patients and the public are still likely to be confused about whether such a practitioner is medically trained, or podiatrically trained.

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

The main unintended consequence of a change in title to “Surgical podiatrist” is that patients and the public will remain confused about the experience, background, and training of such a practitioner, believing them to be medically trained, as distinct from podiatrically trained.

If the proposed change in title is designed in the interests of public health to avoid such confusion, then I believe that such a change would be self-defeating.

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## Your responses to the consultation questions

<b>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?</b>
<p>No.</p> <p>Patients do not know that the person operating on them is not a medically trained specialist as the operator uses words like "Doctor", "Surgeon", "Surgical".</p> <p>I believe the term should be changed to "operative podiatrist". Words like doctor, surgeon, surgical create unnecessary ambiguity. The term "Operative podiatrist" is clear, non-ambiguous and describes the situation as it is, i.e. it is a podiatrist that operates. Other reasons are indicated below as answers for other questions.</p>
<b>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?</b>
<p>As explained above, I recommend use of the term "Operative Podiatrist". Using words like "surgery" and its derivatives create unnecessary confusion. The term "Operative podiatrist" is clear, non-ambiguous and describes the situation as it is, i.e. it is a podiatrist that operates.</p>
<b>3. What are the potential impacts for consumers of the proposed change in title?</b>
<p>If/When a new term such as "Operative Podiatrist" is introduced, the terms "Podiatric Surgeon" and "Foot and Ankle Surgeon" need to be removed from the Operative Podiatrists' websites and advertisements. This will benefit patients greatly as it will remove ambiguity and enhance patient care and satisfaction.</p>
<b>4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?</b>
<p>The potential impacts/costs for the operative podiatrists will not be substantial as it will include removing the ambiguous terms from their advertising/website/business cards etc. I have recently undertaken changes to my website and the cost was \$5,000.</p> <p>While not insignificant, it will improve patient education and inform patient about the decisions they are undertaking. That should be paramount.</p>

The operating podiatrist may argue they may lose patients and reduce income.

I contend that the flow on effects of changing the title for operative podiatrists regarding loss of patients should not be dramatic if the podiatrist was honest with the patients in the first place without misrepresentation.

If there is a decrease/loss of patients following the title change, then it stands to reason that the patients were mis-informed/confused at best and deceived at worst about the training of the operative podiatrist and/or the operative podiatrist has misrepresented themselves by claiming themselves to be a foot and ankle surgeon which they are clearly not.

In either case this is a change that needs to occur for patient benefit.

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

Avoid use of words like "Doctor", "Surgery" and their derivatives such as surgical in the title. There is no need. This is a historic opportunity. Allowing operating podiatrists to continue using ambiguous such as "surgical podiatrist" will continue patient confusion.

Additionally, the title of "Surgeon" in the medical profession has recently been restricted for use by medical practitioners holding specialist registration in surgery/obstetrics/ophthalmology following an amendment to the National Law introduced in a new section 115A.

In the interests of patient safety and awareness, these rules should be applied across the entire health care profession and not just to medical practitioners.

I find it astonishing that the use of the title "Surgeon" while restricted for use by appropriate medical practitioners can be used liberally by non-medical practitioners.

Thus, once again avoid the use of words like "Doctor", "Surgery" and its derivatives to avoid patient confusion and improve safety and awareness.

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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?**

Yes, as patients are currently confused regarding the term 'podiatric surgeon'. They see these practitioners and they assume them to be medical doctors who have undergone general medical training which is not the case.

**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?**

Potential alternative title could be 'procedural podiatrist'.

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

They will be better informed about the background knowledge and medical/procedural training of the surgical practitioner.

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

May take clinician time to change advertising and marketing documents to new title.

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

**To:** [REDACTED]  
**Subject:** Podiatryconsultation  
**Date:** Proposed change of protected title  
Friday, 18 October 2024 1:03:39 PM

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<b>Your answer:</b> <input type="checkbox"/> Organisation Name of organisation: <a href="#">Click or tap here to enter text.</a> Contact email: <a href="#">Click or tap here to enter text.</a> <input checked="" type="checkbox"/> Myself [REDACTED] [REDACTED]
<b>Question B</b> If you are completing this submission as an individual, are you: <input type="checkbox"/> A registered health practitioner? Profession: <a href="#">Click or tap here to enter text.</a> <input checked="" type="checkbox"/> A member of the public? <input type="checkbox"/> Other: <a href="#">Click or tap here to enter text.</a>
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#### Your responses to the consultation questions

<b>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?</b>
I do not agree with the change of title. I see the current term 'Podiatric Surgeon' as satisfactorily describing the surgeon's role
<b>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?</b>
No

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<b>3. What are the potential impacts for consumers of the proposed change in title?</b>
It may confuse the public. Also, it will incur an expense to some that seems entirely unnecessary.

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

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

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