

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

September 2024

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Making a submission

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Consultation closes on 8 November 2024.

Publication of submissions

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Initial questions

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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: Dental Hygienists Association of Australia.

Contact email: [REDACTED]

☐ 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

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, the proposed title is clear and makes sense.

- 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?**

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

The consumer should be better informed and less likely to be misled or confused.

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

There will be some costs involved to change over signs and stationeries. However this is necessary for the protection of the public.

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

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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: Department of Health Tasmania

Contact email: [REDACTED]

☐ 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:

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

☐ A member of the public?

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

Question C

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☐ 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?

Tasmania supports the change of title to 'surgical podiatrist' to improve public understanding of the qualifications and training of podiatric surgeons. However, it is noted that this approach is not consistent with other titles such as 'dental surgeon' and 'oral surgeon'.

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?

Tasmania notes alternative suggestions such as 'operative podiatrist' have been proposed by some stakeholders. Tasmania is not supportive of this title, as it is deemed to be confusing for consumers and does not align with the intent of a title being clear that the practitioner is a specialist podiatrist who performs surgery.

If surgical podiatrists is not adopted, Tasmania notes that 'podiatric surgeon' will be retained and is comfortable with this option. In keeping this title, the Board needs to clearly articulate what a podiatric surgeon's scope of practice is, how it differs or not from the scope of practice for an orthopaedic surgeon working in the same area and if complications arise, do they deal with it or refer it to an orthopaedic surgeon.
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3. What are the potential impacts for consumers of the proposed change in title?

Tasmania expects the change in title will result in greater clarity for consumers who will be able to make more informed choices about the care they receive allowing more effective assessment of the potential benefits and risks of the treatment approach they select. Tasmania agrees this change should improve consumer understanding and confidence.
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4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?
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Podiatric surgeons will incur costs associated with updating signage, advertising collateral or campaigns, prescription pads, letterhead, patient information leaflets etc. It is possible patient volumes and referral rates will decrease although it is difficult to estimate the impact (if any) of this.

5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?
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The professional identity of podiatric surgeons is likely to be impacted by this change and may result in fewer enrolments and completions of training courses, reducing availability of an already very small workforce.

The change of title could be perceived as a 'downgrading' and thereby damage public trust.

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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: Health Complaints Commissioner

Contact email: [REDACTED]

☐ Myself

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

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

Question B

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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 HCC agrees with any change that would make it easier for consumers/patients, their carers and family to understand and make clear that the practitioner is a specialist podiatrist who performs surgery.
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The HCC gets very few complaints about podiatry and surgical podiatrist. However, recognise the complexity of the complaint system is a challenge for consumers to navigate.
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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 podiatrist surgeon. Including 'specialist' in the title may increase understanding by consumers that this is a specialty and different from the general podiatrist.
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The HCC believe the protected title should be tested with a range of consumer groups to ensure it provides the clarity and represents the specialisation required.
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3. What are the potential impacts for consumers of the proposed change in title?

It is possible that consumers may not understand the change in title as intended.

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

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

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Question A
Are you completing this submission on behalf of an organisation or as an individual?
Your answer: <input checked="" type="checkbox"/> Organisation Name of organisation: kingsgrove day hospital Contact email:  <input type="checkbox"/> Myself Name: Contact email:
Question B
If you are completing this submission as an individual, are you:
<input type="checkbox"/> A registered health practitioner? Profession: Podiatrist <input type="checkbox"/> A member of the public? <input checked="" type="checkbox"/> Other: director of nursing
Question C
Would you like your submission to be published?
<input checked="" type="checkbox"/> Yes, publish my submission with my name/organisation name <input type="checkbox"/> Yes, publish my submission without my name/ organisation name <input type="checkbox"/> 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, I do not agree, as it will be very confusing for the general public to understand the difference between a podiatrist and a surgical podiatrist,

- 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?**

Podiatry surgeon, as then the public understands that it is a surgeon who is qualified, that will be performing the surgery, the proposed new title suggests that the surgeon is still in training

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

Confusion, and lack of support for podiatry surgeons who have trained in the field, due to total confusion for the public and for referring Doctors

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

Potential loss of business, loss of income from decreased surgeries due to lack of support from hospitals.

Decreased support from health funds, and potential. loss of support from Medicare.

The recent findings from the private hospital sector, financial health report, has showed that there are already a decreased number of admissions to the private sector, and the hospitals are under financial constraints, podiatry surgeons offer services within the private hospital field and by changing their title will reduce the amount of potential future business within the private sector and therefore reduce jobs, manufacturing, I.T,

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

Reduced business within the private health sector , a sector that's already has significant burdens

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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: Royal College of Podiatry

Contact [REDACTED]

☐ 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.](#)

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☐ 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.