

## 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.**

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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.

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<b>Initial questions</b>
<i>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 These details will not be published in any summary of the collated feedback from this consultation.</i>
<b>Question A</b> Are you completing this submission on behalf of an organisation or as an individual?
<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 <div style="background-color: black; height: 15px; width: 100px; margin-bottom: 5px;"></div> <div style="background-color: black; height: 15px; width: 250px;"></div>
<b>Question B</b> If you are completing this submission as an individual, are you: <input checked="" type="checkbox"/> A registered health practitioner? Profession: Podiatrist <input type="checkbox"/> A member of the public? <input type="checkbox"/> Other: <a href="#">Click or tap here to enter text.</a>
<b>Question C</b> Would you like your submission to be published? <input type="checkbox"/> Yes, publish my submission <b>with</b> my name/organisation name <input checked="" type="checkbox"/> Yes, publish my submission <b>without</b> my name/ organisation name <input type="checkbox"/> No – <b>do not</b> 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

1. The title 'surgeon' signifies rigorous training, clinical expertise, and advanced surgical competencies. 2. 40+ years of establishment in Australia and internationally. 3. Changing the title would cause confusion among patients and healthcare professionals. 4. Undermining the distinct and specialized nature of podiatric surgeons' qualifications. 5. Alignment with global standards (US, UK).

**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?**

NO Podiatric Surgeon is fine in my opinion

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

It may create confusion within the public and to those providers referring on to Podiatric Surgeons.

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

By diminishing the perceived value of surgical training, this change may inadvertently favour orthopedic surgeons, leading to monopolistic conditions in the surgical marketplace. With limited alternatives, patients could be forced to seek care from orthopedic surgeons, driving up the cost of surgical services and limiting patient choice. Such market conditions have already led to soaring out-of-pocket expenses for common procedures like hip and knee replacements

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

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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

#### Question B

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

☒ A registered health practitioner?

Profession: 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?

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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 disagree with the idea to modify the protected title. To be honest, I don't mind, but I believe the podiatry board should consider different aspects and make the appropriate conclusion.

First, it is a protected title, which suggests that certain people have invested time, energy, and possibly knowledge to achieve this title and others trusted their knowledge. Now, why do you believe it has been ineffective? This is due to an independent review. I feel that a reviewer's role is to describe the status, and he did not want to decide. According to the reviewer, some people believe that podiatric surgeons are medical physicians, although I'm not sure what part of "podiatric surgeon" word means medical doctor. I honestly do not think that the title was misleading, here. I feel that no matter what the label, people traditionally believe that only medical doctors can perform foot surgery. Unfortunately, some practitioners who benefit from this traditional belief do not want to change this situation as well. The main action should be to educate individuals that foot surgery may be performed by both medical and non-medical practitioners. This goal cannot be achieved by modifying the title.

Changing the title here may appease the reviewer but does not benefit the community. Erroneous practitioners may establish themselves based on titles rather than knowledge and skills, resulting in increased reliance on the health system to make decisions rather than self-conducting necessary investigations and eventually will result in a loss of trust in the healthcare system for several reasons.

### 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, changing titles appears to be simple, but it causes more problems than it solves. Let's focus on the root causes as I described in question N.1.

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

As above

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

Traditionally, when you study a field and expand your knowledge, you should feel secure and proud. As a graduate in this country, it is tough to realise how what you have studied, rather than providing stability and support, is causing more problems. Still, you don't know what you should be named. You should be wary of your friend and competitor since the former lacks self-confidence and the latter abuses traditional power. Would you like to know more?

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

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#### 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?

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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. As a consumer who has had podiatric surgery, it makes me feel like it is just a podiatrist who is allowed to do basic procedures, I wouldn't associate it with the scope of practice they actually have.

**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?**

No

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

I think it will confuse a lot of consumers and will make the role of podiatric surgeons unclear.

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

They will have to change their branding which is costly, they are also clearly against this change, so I would encourage the board to consider the potential mental health impacts of such a change.

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

It looks like this is being done under the pressure of orthopaedic surgeons who are unhappy with the title of podiatric surgeon. I'd encourage the board to stand up for their members and maintain their protected titles.

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

Myself

[REDACTED]

[REDACTED]

#### Question B

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

A registered health practitioner?

Profession: Podiatrist

#### Question C

Would you like your submission to be published?

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

### Your responses to the consultation questions

- 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 believe the title of "podiatric surgeon" should be retained. This reflects the professional capabilities of the profession and acknowledges the extensive training that is required to attain specialist registration.

- 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?

No

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<ul style="list-style-type: none"><li>• <b>What are the potential impacts for consumers of the proposed change in title?</b></li></ul>
--

Confusion between scope of practice of general podiatrists versus specialist registration. Reduced confidence in the professional capabilities of podiatric surgeons.
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<ul style="list-style-type: none"><li>• <b>What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?</b></li></ul>
---

Large costs involved to "rebrand" themselves and the potential for loss of income if consumer confidence in the the profession is eroded.
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<ul style="list-style-type: none"><li>• <b>Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?</b></li></ul>
---

The general public may be less inclined to present to general podiatrists for minor surgical procedures which are within the capabilities of the general podiatrist e.g. nail surgery or wart curettage, and instead seek out the "surgical podiatrist." This may have professional implications for the general podiatrist.
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I believe any confusion regarding a podiatric surgeon's education and training can be remedied with clearer explanations provided to prospective patients by both the podiatric surgeon and any referring practitioner. In my own practice I have made a deliberate effort to explain to patients that the podiatric surgeon I am referring them to is a podiatrist who has undertaken extensive training in order to perform reconstructive foot surgery and is not a medical doctor. Patients have been very receptive to this information.
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I'd also like to add my thoughts regarding high levels of notifications of adverse outcomes amongst podiatric surgeons. In my practice I've seen many people who have had foot surgery, usually by orthopaedic surgeons. There are always a mix of outcomes from the very successful to the catastrophic. This is the case for all surgeries. I do believe that if a patient has a less than satisfactory outcome or complication following surgery, they may be more likely to make a formal complaint (or encouraged to do so by a medical practitioner) if the surgeon was a podiatric surgeon rather than an orthopaedic surgeon. This would skew any comparisons between professions.
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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?

I agree with the proposal to change the protected title 'podiatric surgeon' although I feel that a change to other, less misleading titles, would offer greater ability for a patient to make an informed choice about their care. The term 'surgical podiatrist' still references 'surgeon and surgery' which is confusing.

The recent issue with cosmetic surgeons resulted in change in legislation to restrict the title 'surgeon' and 'surgical' to medical practitioners who have undergone AMC-accredited advanced surgical training. However, this restriction does not apply to podiatrists.

I have had many patients who have presented to me for a second opinion genuinely surprised that the 'podiatric surgeon' they saw initially was not a medically trained doctor. These patients have suffered post-operative complications but were told to see their General Practitioner or local Emergency Department for DVT prophylaxis, to follow up histopathology results and obtain adequate analgesia. This was not disclosed to the patient prior to their podiatric procedure so the patient was unaware of the extra time, cost and delay in treatment should any medical management be required.

In addition, 'podiatric surgery' sounds very similar to 'paediatric surgery' even though surgical podiatrists have very limited experience working with children. It can be difficult for the general public to understand the difference of a phonetically similar title resulting in unnecessary delay, investigations and cost when treating children where children are seen by a surgical podiatrist who is not qualified to manage their condition.

### 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 believe the title 'operative credentialed podiatrist' could also be considered. This is similar to other specialty podiatry titles such as 'paediatric credentialed podiatrist' and 'sports credentialed podiatrist'.

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

The current confusing and misleading dual title of surgeon that encompasses medically trained orthopaedic surgeons and allied health trained podiatrists means the general public is currently unable to make an informed choice about the qualifications of their treating practitioner. Removing the title 'podiatric surgeon' is a small step clarifying the qualifications of the practitioner performing surgery and means the public can make more of an informed choice about their care.

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

Podiatric surgeons currently market themselves heavily as practitioners of 'foot and ankle medicine'. It is my experience that some podiatric surgeons capitalise on public confusion so potential costs could be a decreased referral base when the public realise that their podiatric surgeon is not a medically trained doctor. Please see below screenshot as an example of advertising 'foot and ankle medicine' including a logo of a foot with a stethoscope, even though a podiatrist receives no training in how to



use a stethoscope, giving the impression to the public that the practitioner is a medical doctor (who are trained in using a stethoscope!).

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

The rate of AHPRA notifications are nine times higher for podiatric surgeons compared to orthopaedic foot and ankle surgeons, even when high frequency outliers are excluded.

The Australian College of Podiatric Surgeons (ACPS) are clearly lobbying heavily to protect their financial interests and private practice income – see immediate past president's address via <https://youtu.be/wwfwYeBvoaM?si=1IZuFmfsonzQIHxS>.

However, there is a huge shortage of qualified Podiatrists in public hospitals. Waiting lists for foot and ankle surgery in my public hospital have been reduced to 2-3 months by employing more orthopaedic surgeons with subspecialty fellowship training in foot and ankle surgery. However, there is a need for more general podiatrists and this is an opportunity to utilise the general podiatry skills of podiatric surgeons which may help a workforce shortage in general podiatry. There is also an

opportunity for re-training for podiatric surgeons in subspecialty podiatry areas such as paediatrics and sports which may help fill a community need and work collaboratively with current, experienced general and credentialed podiatrists rather than as solo, unsupervised practitioners.