

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 speciality 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.

Publication of submissions

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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 These details will not be published in any summary of the collated feedback from this consultation.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

☐

☐

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, I do not agree with the proposal to change the protected title. I disagree with the assertion that the title 'surgical podiatrist' makes it clear that the practitioner is a specialist podiatrist who performs surgery. It is far more confusing than the title 'podiatric 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?

No, I believe 'podiatric surgeon' provides the greatest clarity to consumers. It is a simple and accurate descriptor of what services the practitioner is qualified to provide.

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

Confusion and misunderstanding about what podiatric surgeons do and an eroding of trust in the profession. I believe consumers would be less likely to seek out the services of someone calling themselves a 'surgical podiatrist' and therefore less likely to seek treatment from the practitioner best suited to provide them the health care that they need.

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

The potential impacts of such a change could be very far reaching, and in the worst case scenario destroy the profession entirely.

The Independent Review found that podiatric surgery was a well-established and generally well-regulated sub-specialty that should be supported to flourish. It would be very unfortunate if the outcome from the Review was to make the profession unviable.

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

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☒ A registered health practitioner?

Profession: Orthopaedic Surgeon

☐ A member of the public?

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

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NO.

There is an intimation that the podiatrist has done surgical training, and the average Australian would assume this is a doctor who has done training with the college of surgeons.

Patients don't know that the person operating on them is not a medically trained specialist because they use titles "Doctor" and "Surgeon" .

I recently saw a patient Mr J. N on the 14/9/24 who had had surgery performed on both feet, which he states he was poorly consented, had complications of an atypical calf release, revision surgery and antibiotics. The cheilectomy performed on the foot has removed a significant amount of bone of the 1st metatarsal.

He clearly stated that he never knew the podiatrist was not a doctor or surgeon, was very upset when he found out and would never have seen them if he knew. He has a permanent calf weakness and scarring with a 15cm incision and muscular herniation. and requires revision surgery on the foot.

The patient has specifically asked me to report this.

He was referred to the operating podiatrist by a 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?

I and AOFAS officially support the introduction of the term "Operative Podiatrist".

We want to reduce confusion by forbidding the use of the word "Surgeon" and all its derivatives including the word "Surgical".

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

There are positive implications in that the public will be fully informed. The current situation is purposefully misleading.

There are no negative impacts for consumers to be accurately informed.

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

If and 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

There is little negative impact - there may be a risk of decreased revenue – however revenue from the public for healthcare should not come from giving the perception they have trained the same as Surgeons who completed training with RACS.

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

The proposed change in title which includes “ Surgical” has the consequence of misleading the public.

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.

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Question B If you are completing this submission as an individual, are you: <input checked="" type="checkbox"/> A registered health practitioner? Profession: Podiatric Surgeon <input type="checkbox"/> A member of the public? <input type="checkbox"/> Other: Click or tap here to enter text.
Question C Would you like your submission to be published? <input type="checkbox"/> 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 do not support the proposal to change the protected title from "Podiatric Surgeon" to "Surgical Podiatrist." The title "Podiatric Surgeon" is well-established under national law and aligns with international practices. It accurately reflects the qualifications of a podiatrist who has completed a comprehensive and accredited surgical training program in foot and ankle surgery. It's important to note that the title does not imply that the individual holds a medical degree.

In healthcare, there are several professions where the title "surgeon" is used without a medical degree. For example, dentists, both general and specialist, use titles such as "Oral Surgeon" and "Dental Surgeon" without causing confusion about their expertise. This precedent shows that the term "surgeon" is not restricted to those with medical degrees, but rather reflects specialised training in a specific field. Thus, the title "Podiatric Surgeon" is appropriate and fits within established healthcare terminology, without misleading the public.

Podiatric Surgeons in Australia are highly trained specialists focused on foot and ankle surgery, both in surgical and non-surgical management. An independent review by Professor Ron Paterson found no evidence to suggest that the quality of training for Podiatric Surgeons is lacking. In fact, the review affirmed that the accreditation standards for podiatric surgery are robust and comparable to those used in medical education. Furthermore, Associate Professor Kerin Fielding, the President of RACS, has publicly recognized that Podiatric Surgeons are well-trained and do excellent work.

It is important to note that the title change is not driven by the patients, rather, a group of professionals who are providers of foot and ankle surgery. This group tends to operate in isolation from others, rather than collaborating or sharing knowledge. This isolation can lead to a lack of communication, cooperation, and coordination between different professions or specialties. The tendency of these professionals within these silos to prioritise their own group's interests, often at the expense of broader collaboration or interdisciplinary efforts.

Breaking down these silos and fostering collaboration is often seen as key to improving outcomes in complex fields like healthcare.

Given their specialised and rigorous training, it is essential that practitioners in this field retain the title of "Podiatric Surgeon." Changing this title undermines their expertise and could create unnecessary confusion for both patients and referring healthcare professionals. The term "Podiatric Surgeon" clearly defines the scope of practice and expertise, which is crucial for patient trust. Introducing the term "Surgical Podiatrist" would create inconsistency with international standards, potentially complicating global collaboration and recognition in the field of foot and ankle surgery.

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 "Podiatric Surgeon" is already well-established and provides a clear and accurate description of the profession within both the Australian and global healthcare systems. Changing this title is unlikely to improve consumer understanding and may, in fact, cause confusion. The proposed term "Surgical Podiatrist" lacks precision and could misrepresent the specialised qualifications and scope of practice of podiatric surgeons, which is distinct from that of general podiatrists.

Podiatric surgeons complete extensive, focused training to earn their title, and this expertise should be properly acknowledged. Rather than changing the title, greater effort should be put into educating

patients through better consent processes, public information campaigns, and clearer communication tools.

However, if a title change is deemed necessary, I recommend more specific alternatives that preserve clarity, such as:

- Podiatric Surgeon (Foot and Ankle Specialist)
- Podiatric (Foot and Ankle) Surgeon

These options would maintain public understanding without implying any misleading information regarding qualifications.

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

The proposal to change the title of “Podiatric Surgeon” to “Surgical Podiatrist” seems to be largely driven by other providers of foot surgery, such as orthopedic surgeons, rather than being rooted in patient concerns. This change could have significant consequences for patient’s accessing specialised care.

First, weakening the professional title of podiatric surgeons could diminish their standing within the healthcare system, which may lead to fewer patients being referred for podiatric surgery. This is especially concerning for rural and underserved areas where podiatric surgeons often provide critical foot and ankle surgical services. These communities rely on accessible and affordable care, and a reduction in the availability of podiatric surgeons could severely limit the options for patients needing specialised treatment.

Furthermore, private health insurers might use the title change as an opportunity to justify cutting or restricting rebates for podiatric surgical services. By downgrading the perception of the profession through a less specialised title, insurers may argue that the procedures performed by “Surgical Podiatrists” warrant lower reimbursements, viewing them as less valuable or complex than those carried out by surgeons with more prestigious titles. This would place a greater financial burden on patients, potentially deterring them from seeking necessary surgical interventions and affecting their overall care outcomes.

Ultimately, this title change may create a domino effect, not only diminishing the professional recognition of podiatric surgeons but also reducing access to vital surgical services for patients, particularly in regions where healthcare options are already limited. Protecting the title “Podiatric Surgeon” is essential for ensuring continued access to specialised foot and ankle care without creating barriers based on geography or insurance coverage.

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

The proposed title change from “Podiatric Surgeon” to “Surgical Podiatrist” will have broad consequences for the profession and its practitioners. It devalues the intensive training and hard work required to earn the title of podiatric surgeon and risks damaging morale, especially among podiatric surgical trainees and those currently practicing. Such a change may contribute to feelings of imposter syndrome, as the new title doesn’t accurately reflect the expertise and qualifications involved.

This shift could also confuse potential referrers, such as GPs and general podiatrists, who currently trust in our qualifications. The confusion could erode relationships between referring doctors and specialists, impacting patient access to foot and ankle surgical care. Moreover, it plays into the long-standing professional rivalry with orthopedic surgeons, giving them further ammunition to undermine podiatric surgeons and potentially worsen existing barriers to care, such as limited access to public hospital facilities.

The change would also introduce costly administrative burdens, requiring rebranding across clinics, legal documents, marketing materials, and insurance claims, all of which would divert resources better used for patient care. These changes threaten not just practitioners but the entire healthcare system, leading to increased confusion among patients and referrers and affecting the overall provision of foot and ankle surgical care in Australia.

In summary, this proposed title change would weaken the profession, create confusion, and add unnecessary financial and operational burdens, with no clear benefit to patient outcomes.

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

1. **Erosion of Trust:** Changing the title from “Podiatric Surgeon” to “Surgical Podiatrist” could lead to confusion among patients and referrers regarding the qualifications and expertise of practitioners. This may result in diminished trust in the profession, which could discourage patients from seeking necessary surgical care.
2. **Impact on Patient Access:** The title change could deter potential referrers, such as general practitioners and other healthcare providers, from directing patients to podiatric surgeons due to uncertainty about the new designation. This may limit patient access to vital podiatric surgical services, particularly in rural and underserved areas.
3. **Financial Burden:** The administrative costs associated with rebranding—updating legal documents, marketing materials, clinic signage, and insurance claims—could impose a significant financial burden on practitioners, particularly those in independent practice. This could divert resources away from patient care and training.
4. **Increased Professional Isolation:** The change could deepen the divide between podiatric surgeons and other surgical specialties. It may further entrench existing silos in the healthcare system, reducing opportunities for collaboration and knowledge sharing among providers.
5. **Retention Issues:** The devaluation of the title might contribute to increased frustration and burnout among podiatric surgeons and trainees, possibly leading to higher turnover rates and a shortage of specialists in the field. This could have long-term implications for the availability of foot and ankle surgical care.
6. **Reinforcement of Competition:** The proposed change could embolden opposition from orthopedic surgeons and other stakeholders who historically have undermined the podiatric profession. This could lead to intensified competition and further attempts to discredit podiatric surgical training and qualifications.
7. **Patient Confusion:** Patients already face challenges in understanding the various healthcare titles and roles. A change in title could exacerbate this confusion, making it harder for patients to identify qualified practitioners for their specific needs, potentially impacting their overall care experience.

By considering these unintended consequences, the Board can better understand the broader implications of the proposed title change and its potential effects on the podiatric surgical profession and patient care.

For the past 30 years, I have dedicated my career exclusively to Podiatric Foot and Ankle Surgery. In this time, I've come to recognise the critical role that clear communication plays in ensuring patients understand my qualifications. The extensive paperwork involved in informing patients is a necessary part of daily life for a practicing Podiatric Surgeon. Patients frequently express a sense of clarity when they learn that there is a specialty focused solely on foot and ankle surgery, as opposed to general practitioners with a broader interest in these areas.

The Australasian College of Podiatric Surgeons provides robust resources, including comprehensive documentation and a well-designed website, which outlines the extensive training podiatric surgeons undergo. In addition to this, I personally provide information packages to every patient, reinforcing the transparency of our qualifications and expertise.

However, any change to the recognition of our title would erode the community's confidence and undermine our professional standing among healthcare peers. It would also discourage future interest in specialising in foot and ankle pathology, a field that has already been downplayed by some healthcare providers. Healthy competition among foot and ankle specialists ensures accountability, and weakening this landscape would have serious consequences for the future of this essential specialty.

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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: [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.](#) General podiatrist

☐ 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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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?

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

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

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 strongly disagree with the proposal to change the title of 'podiatric surgeon' to 'surgical podiatrist'. I believe the current title of 'podiatric surgeon' is the most suitable and appropriately reflect the level of training, time and effort that my colleagues have been putting into this profession. As a general podiatrist, I do not support this proposed change.

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, I don't. I do not suggest any change in current title of 'podiatric surgeon'.

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

I believe that changing to new title will lead to more even more confusion to patient. I have been working for over 10 years. I'm aware of the growth of public awareness on the title 'general podiatrist' and 'podiatric surgeon'. It has been taking a long time for public to understand what our professions have to offer. Many podiatrists, nowadays, called themselves sport podiatrists, paediatric podiatrists, family podiatrists and so on. Public has started questioning how many specialities podiatry has and whether they are much better than the local podiatrists who are advertising themselves as 'general podiatrists'. Adding another title of 'surgical podiatrist' will confuse public further.

The proposed change of title will also significantly affect public trust to 'podiatric surgeons'. Generally, people will define the person, who does surgery surgeon. Without the word 'surgeon', everyone will understand it as general professions. The term 'surgical podiatrist' does not sufficiently reflect the scope of practices that 'podiatric surgeons' have been doing. As we all know, once patients do not have enough trust on practitioners, the treatment outcomes will be severely impacted.

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

Podiatric surgeons in Australia have been extensively trained either in The University of Western Australia or Australasian College of Podiatric Surgery. Their trainings may vary from 5-7 years, plus all international trainings. They have put in so much in terms of energy, family time, and especially finance. They do not get internship wages like any other surgical registrars have. By taking their 'podiatric surgeon' title, they potentially lose trust in public eyes as aforementioned. Subsequently, I believe their incomes will be dramatically affected.

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

I believe when the Board asks our opinions, you have considered many aspects. I would like to emphasize a few points.

- One must agree that all surgeries carry risks. If we do a calculation on the rate of failure in any surgeries. I believe failure rate of surgeries performed by podiatric

surgeons is not higher than orthopedic surgeons or any other specialists. As a result, I do not see any correlation between changing 'podiatric surgeon' title with public safety.

- Completion of MBBS degree has never been a requirement to be a podiatric surgeon in any country around the world. All current podiatric surgeons in the world completed their Doctor of Podiatric Medicine degree, then further advanced with their surgical training. Australian Podiatric surgical training has been operating along with global fashion. I do not see any reason why we must try to be the odd one. If it is just to satisfy the ego and arrogance of a group of people, then it is completely unnecessary. I believe we are matured enough to work together for a better medical system.
- As I mentioned earlier, Australian podiatric surgeons have trained extensively for many years. Their training programs have been accredited by AHPRA. It means that their skills and knowledge have been approved by AHPRA to practise as podiatric surgeons. By changing the title, it indirectly points out that AHPRA accreditation team has not done their job properly. So that the Board now worries about podiatric surgeon's skills in managing public's foot health.
- Lastly, I do believe that public medical literacy has grown so much in the past 10 years. It is a good sign for our country. Instead of changing the title to further confuse public, and degrade podiatric surgeons, why don't we educate public better? I believe many patients who come to podiatric surgeons, they have seen general podiatrists and are well aware of who podiatric surgeons are. I believe people who do not know what they are dealing with, should be educated properly by their GPs, general podiatrists and so on.

I do hope that the Board will carefully and fairly consider all aspects before making any decision. Again in my opinion, title change is completely unnecessary and should not be a question from the first place.

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☐ 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?

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?