

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.

Please provide any feedback in this document, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

Making a submission

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

Consultation closes on 8 November 2024.

Publication of submissions

The Board publishes submissions at its discretion. The Board generally publishes submissions on its website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we will remove personally identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them, and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence.

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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:

Myself

████████████████████

██

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.](#)

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 do not agree.

Podiatric Surgeon is the historical title, and remains the standard title across the English speaking world. Forcing our podiatric surgeons to go by a different naming convention to the UK and US counterparts would only serve to further muddy the waters and confuse the public.

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?

All podiatrists are 'surgical podiatrists' as we can all perform basic nail surgeries without the need for additional study. 'Surgical podiatrist' provides the least amount of clarity to the consumer, and if anything only adds more confusion to the already murky scope of practice a podiatrist operates under. As you are well aware a large chunk of the public is not aware of the role, scope or function of podiatry in general - implying that now there are surgical and non-surgical podiatrists (without even getting to the topic of podiatric surgeons) will only serve to further dilute our 'brand recognition' in the public sphere.

Podiatric Surgeon is a title that is clear, concise, has historical precedent and has recognition across the english speaking world.

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

See above - surgical podiatrist as a title only serves to confuse the public and dilutes both the title of podiatrist and podiatric surgeon.

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

It serves to weaken the global standing of the Australian cohort of Podiatric Surgeons relative to their counterparts overseas, with possible flow-on effects to the quality of care / service our Podiatric Surgeons will be able to provide in the long term if they are forced to move out of step with the global standard.

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

As stated above, this change in title will also confuse the public as to the scope and role of a 'standard' podiatrist, with the implication that only some of us are qualified to perform surgeries.

For podiatric surgeons the loss of their surgical title will likely limit their ability to adequately defend their scope of practice (both personally and as a profession) against the AMA and similar bodies if attempts are made to limit or push them out of the surgical space.

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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

[Redacted text]

Question B

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

A registered health practitioner?

Profession: Emergency Medicine (in the USA, [Redacted text] seeing many patients with foot and ankle issues requiring surgical care) [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

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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 do not agree, primarily because the proposed title change does NOT add clarity (it rather *adds* confusion), and *it does not conform to common usage*. The first part of any surgeon's title, in common parlance, refers to their area of training and expertise. Some examples would be neurosurgeons, cardiac surgeons, urologic surgeons, and . . . podiatric surgeons. I think it is already quite apparent that a podiatric surgeon is a specialist podiatrist who performs surgery.

I would also like to add that most orthopedic surgeons (at least in the U.S.) end up concentrating on specific areas of the body, or specific joints, and often complete a fellowship in, for instance, shoulder surgery, or hip surgery. As an Emergency Physician, I would almost always refer my patients requiring foot or ankle surgery to a podiatric surgeon, since I consider podiatric surgeons to be the *true experts* when it comes to maladies or injuries to that area of the body, eclipsing the vast majority of orthopedists. In my experience, only an orthopedic surgeon who has completed a foot and ankle fellowship would approach the podiatric surgeon's level of experience and competence. If you needed retinal surgery, would you rather see a general ophthalmologist, or a retinal specialist?

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 have no alternative suggestion for the protected title, since "podiatric surgeon" is already in common use, and it makes sense. Would we want to change the name of urologic surgeons to surgical urologists? I think not.

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

I believe it would *create confusion* amongst the public, since (as stated above) "podiatric surgeon" is already in common use, and it makes sense.

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

Not only will it require explanation to both current and future patients, which takes valuable time, but it will require costly changes to printed materials and signage. That time and money could be spent on much more fruitful uses.

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

Yes, and that would be: What is best for the patient(s)?

This kerfuffle really does sound like a “turf war” between orthopedic surgeons and podiatry/podiatric surgeons. Why not consider (as we in medical care *always should* consider!) “What is best for the patient(s)?”

My answer would be to leave the current (and most appropriate) title of podiatric surgeon as is, and don't introduce confusion by making the proposed change of title.

Thank you.

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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

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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?

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 neither a misnomer nor a misrepresentation. At the completion of their rigorous and extensive training, podiatric surgeons are precisely as their title indicates -- podiatric surgeons. They do not cease to be podiatrists, or specialist podiatrists, already expert in host of foot and lower-limb ailments, but they are also surgeons fully skilled in foot and lower-limb surgery. Their training means they are now, first and foremost, surgeons uniquely skilled in foot and ankle surgery. Any proposed change to this title would put the emphasis of the training and expertise entirely in the wrong place and not alleviate confusion; rather it would likely add to it.

Podiatric surgeons are recognized by and accredited with The Australian Practitioners Health Regulatory Authority (APHRA). The title Podiatric Surgeon, is also an accepted international term, and is standard in both the USA and the UK where the confusion claimed for the title appears not to exist.

It is important to emphasize that use of the title Podiatric Surgeon is entirely consistent with the title Orthopaedic Surgeon; that is podiatric surgeons have undertaken the extensive and exhaustive training required to perform foot, ankle and lower limb surgery, just as orthopaedic surgeons have completed the training regime necessary to perform orthopaedic surgery.

The member of each profession is a surgeon, conducting surgery within their fields. That an orthopaedic surgeon is trained to conduct a wider range of surgery does not alter the fact that each professional undertakes surgery that requires high levels of expertise and care and are surgeons.

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. The title Podiatric Surgeon should stand. To change this title would be regressive and entirely at odds with the advancement of this profession.

A change in title will not achieve the objective some have set for it. The solution to confusion and the achievement of clarity lies in the solutions to be put forward by the podiatric surgeons themselves. Nothing else is needed.

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

We are dealing with a faux problem here. It is demonstrably the least persuasive element of the report and lacks integrity at many levels. It is a monument to overstatement. I find it impossible to reconcile the attention given this issue with the nature & number of the concerns and the solutions put forward to address these concerns. The source of concern are identified as:

1. Vexatious complaints from orthopaedic surgeons that (as described elsewhere) form part of an extended turf war against podiatric surgeons. (There is nothing more tendentious - indeed ludicrous - and telling in the report than this comment from an orthopaedic surgeon: "I take umbrage at the term podiatric surgeon. They are podiatrists who operate." What is one to make of this nonsense? In the

pursuit of clarity is it now suggested the public be told that when one operates one is not performing surgery and when one is performing surgery one is not operating?

2. Equally vexatious complaints from disgruntled patients who have not secured the desired results from podiatric surgery and who have, subsequently, been encouraged by an orthopaedic surgeon to attribute this to a lack of medical training of their surgeon. One finds no counter to this in the report. That is, occasions upon which patients have sought out podiatric surgeons to correct surgical errors or shortcomings of orthopaedic surgeons.

3. Feedback from focus groups that included 1. The claim that consumers assumed that a professional with the title podiatric surgeon “must have gone to some kind of medical school” or have had some kind of formal medical qualification. 2. The expressed conviction that professionals without medical training should not be permitted to use the term doctor or surgeon because this would encourage false confidence in the practitioner. Why any subsequent discovery to the contrary would automatically make the confidence formerly placed in this professional ‘false’ or misplaced is not explained.

The weight given these various complaints is at odds with the reports repeated acknowledgement that the training given podiatric surgeons is entirely adequate to the fulfilment of their surgical duties.

Ipsa facto, if the training is entirely adequate then the complaints and concerns as registered above must be deemed insubstantial and unreasonable and cannot possibly be considered grounds for a title review. One does not act on evidence that is inconsistent with the complaint or concern in question.

For the sake of balance and transparency, were those participating in these focus groups (the details of which are disturbingly vague) asked:

why they considered the ‘medical training’ they identify (vaguely) as being absent in the training of podiatric surgeons was considered by them as essential in the setting of a podiatric surgical procedure?

what, precisely, they understood this essential medical training to be?

if they aware that podiatric surgeons receive extensive and relevant medical training consistent with their role and that meets the expectations of the controlling bodies and health ministers?

If, knowing that podiatric surgeons receive extensive medical training (if not that given a medical practitioner) would they be less concerned about the title Podiatric Surgeon and would this knowledge alleviate their concerns regarding their professionalism and expertise?

If they understood that all major surgical procedures occurred in the presence of an anaesthetist, who has the medical training they deem important, would most or all of their concerns be addressed?

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

I cannot offer insight into these things. I am not a podiatric surgeon.

However, as far as the extent to which a title change would ameliorate the concerns of the public over clarity and transparency as identified in the report and its recommendations, I think the impact would be negligible or none.

If an alternative title is chosen and includes any reference to surgery, surgical, or surgeon – as, indeed, it must, then all the existing concerns will remain.

It is difficult to understand why the Podiatric Board imagines that its own suggestion – surgical podiatrist – would improve matters. Has this been explicated by the Board? I would be most interested to discover its reasoning. It would seem, *prime face*, a nonsense.

There is reason to ask what has motivated the Board to contend that podiatric surgeons are and remain podiatrists who do surgery. This is equally tendentious. Given the great length and intensity of training – and the extraordinary level of expertise achieved after its completion – this seems a mischievous and churlish inversion of the skill set of these professionals.

Natural justice and plain commonsense demands that the title Podiatric Surgeon remain, for podiatric surgeons they are.

As to alternative solutions they are simple – and obvious. The Podiatric Board need look no further than the suggestions that will be put forward by the podiatric surgeons themselves.

We should anticipate, in the normal course of things, that podiatric surgeons will, in time, become the first point of consultation for those seeking foot and ankle surgery. This will, in part, be a result of the sheer number of foot and ankle procedures they perform and because of the extraordinary expertise they develop thereby.

It ought not be forgotten, but often is – that their background as podiatrists places them very much ahead of their orthopaedic peers when assessing the functionality of foot and ankle procedures. This is not something that will be heard from orthopods! It is much more remarkable that the Podiatric Board has not taken time to emphasize this.

It is no doubt because of their considerable expertise in foot and ankle care that many satisfied patients have already sought out podiatric surgeons for their surgery despite being denied the financial safety net offered to OS. The sooner this circumstance changes, the better.

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

One must assume that the Podiatry Board is fully cognisant of the potential consequences of the proposed change of title for Podiatric Surgeons. This is another reason why it is so difficult to fathom its willingness to contemplate such an egregious backward step.

The title podiatric surgeon claims no more for these professionals than is their due. The demands of orthopaedic surgeons and the recommendations of the the Board, would give podiatric surgeons a title that is less than their due.

While nearly all the other thirteen recommendations represent progress, this change would be regressive. It makes no sense to demote this profession – for this is its practical implication – when in all other respects of the profession is developing in leaps and bounds.

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Question A

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Your answer:

Organisation

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

Myself

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Question B

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Profession: Podiatrist

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

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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. A change to the title now would create confusion. A 'surgical podiatrist' is not a true representation of what a podiatric surgeon is.

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 (Specialist Podiatrist)

Consistency across terminology is critical and changing a title will not change safety or patient outcomes.

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

Confusion, which could lead to a consumer having a surgery with another surgeon, who does not have the same level of experience in foot and ankle surgery, as the podiatric surgeon.

Consumers will likely be impacted at a cost level, with less funding and more out of pocket cost to the consumer.

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

It will create inadequate professional recognition and will likely be devastating to the field of podiatric surgery.

It would mean that a podiatric surgeon would be seen less than an orthopaedic surgeon – however this is not the case when it comes to the foot and ankle.

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

It will create huge confusion to the consumers and the wide community.
It is a recognised title internationally – why change it.

A title change leading to less recognition – why would a young podiatrist want to further their skill within the profession to become a podiatric surgeon if they will not be recognised.

Education needs to be the main focus not a title change that will achieve nil advantages to neither the podiatry field and or community.

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No, I feel we should fight for Podiatric Surgeon. It needs to not include podiatry or podiatrist in the title.

The name surgical podiatrist then will confuse those general podiatrist that perform nail and wart surgeries. They are podiatrist that perform surgeries too!!

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?

What wrong for fighting for the title Podiatric Surgeon?

We need to distinguish well between what a podiatrist can do and a surgeon. Podiatrist can do nails and wart surgery and surgeons can do this plus bones etc

What's stopping a podiatrist calling themselves a surgical podiatrist who just does nail and wart surgery?? But for them to call themselves a surgeon this is clearly something different that the public would know.

Would general podiatrist loss business form this change. I know when someone searches for ingrown toenail they search podiatrist now not podiatric surgeon. But with the proposed name change google search will show up surgical podiatrist first.

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

See above

We need to distinguish well between what a podiatrist can do and a surgeon. Podiatrist can do nails and wart surgery and surgeons can do this plus bones etc

What's stopping a podiatrist calling themselves a surgical podiatrist who just does nail and wart surgery?? But for them to call themselves a surgeon this is clearly something different that the public would know.

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

Loss of business, a reduction in credibility, and it tis linked to closely to general podiatrists.

There needs to be a clear difference that the public would and should know.

Maybe the public should be survey on the potential name change and see what they think. Would they think a surgical podiatrist could do bunion, claw toes, neuromas etc or just nails and wart like a general podiatrist.

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

The public take on the wording.

Surgeon equals white gown, hospital and links to bony procedures

Surgical podiatrist links to podiatrist who does surgery which would include me a general podiatrist