

## 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](mailto: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 These submissions will not be published on the website or elsewhere.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.

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.

**Published submissions will include the names of the individuals and/or the organisations that made them, unless confidentiality is requested.**

### 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

Name: Mohamed Elbana

Contact email: [REDACTED]

#### 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 with the proposal to change the protected title from "Podiatric Surgeon" to "Surgical Podiatrist." Here's why:

1. **Clarity of Scope and Expertise:** The title "Podiatric Surgeon" is a clear, precise reflection of the highly specialized role these professionals play in the healthcare system. Podiatric surgeons undergo extensive, rigorous training, including advanced surgical residencies and clinical fellowships, to achieve expertise in diagnosing and treating complex foot and ankle conditions through surgical interventions. The current title conveys this specialized training and competence, setting clear expectations for both patients and other healthcare professionals. Changing it to "Surgical Podiatrist" risks downplaying the depth of surgical training involved, as it places more emphasis on podiatry than on surgery. This change could create ambiguity regarding the scope of practice, as the term "podiatrist" is typically associated with non-surgical care.
2. **Patient Understanding and Trust:** For patients seeking specialized surgical care, the title "Podiatric Surgeon" is a clear and trusted identifier. Patients know that when they are seeing a podiatric surgeon, they are consulting a clinician with specific expertise in foot and ankle surgery. Changing the title to "Surgical Podiatrist" could cause confusion, particularly for patients who may not fully understand the distinction between different types of podiatrists and surgeons. This confusion could lead to a mistaken perception that the practitioner is not as qualified or specialized in surgical care, which may erode trust in the profession. In an already complex healthcare system, it is crucial to retain titles that clearly communicate a professional's qualifications and scope of practice.
3. **Professional Identity and Recognition:** The title "Podiatric Surgeon" represents the culmination of years of specialized training and dedication to mastering surgical interventions of the lower extremity. It aligns with the titles used in other surgical specialties, such as "Orthopaedic Surgeon" or "Plastic Surgeon," creating parity and respect within the medical community. Changing the title to "Surgical Podiatrist" could diminish the perceived status of podiatric surgeons among peers in the healthcare system, undermining the professional identity that has been carefully established. Additionally, the title reflects not just the ability to perform surgery but the role of podiatric surgeons as comprehensive providers of both medical and surgical care.
4. **Public and Regulatory Perception:** The move to change the title seems driven more by administrative or political motivations rather than by a genuine need to clarify the scope of practice. This type of change may inadvertently contribute to a "turf war" between professions, as you noted, by undermining the distinct recognition of podiatric surgeons as surgical specialists. Podiatric surgeons have long been recognized by regulatory bodies and the public for their surgical expertise, and changing this title could disrupt established understanding. Furthermore, it could introduce an unnecessary layer of bureaucracy into healthcare management, complicating referrals and interdisciplinary collaboration.
5. **Upholding Professional Standards:** Maintaining the title "Podiatric Surgeon" is essential for preserving the high standards of practice in the field of podiatric surgery. It serves as an important indicator of the qualifications, experience, and responsibility associated with performing foot and ankle surgery. By retaining this title, we ensure that future podiatric surgeons continue to meet the rigorous educational and clinical benchmarks necessary for high-quality surgical care. Altering the title might suggest a lowering of these standards, which could have a ripple effect on training programs, patient safety, and clinical outcomes.
6. **Historical Context and Professional Integrity:** Podiatric surgery has made significant strides in Australia and internationally over recent decades. The recognition of podiatric surgeons as surgical specialists reflects the evolution of the profession and the growing complexity of foot

and ankle care. The title “Podiatric Surgeon” has become synonymous with specialized expertise and changing it now could undermine the hard-won progress in establishing podiatric surgery as a distinct, respected, and integral part of the healthcare system. Moreover, such a change could inadvertently diminish the credibility of the profession in the eyes of policymakers, insurers, and other stakeholders who rely on clear, well-defined professional titles to guide decision-making.

By maintaining the title “Podiatric Surgeon,” patients are reassured that they are receiving care from a surgical specialist with years of advanced training. In contrast, the proposed title change could blur the lines between non-surgical and surgical care, making it more difficult for patients to make informed decisions. The existing title supports patients’ confidence in their provider’s expertise and avoids any potential misunderstandings about the level of care being offered.

## 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?

While I strongly advocate for retaining the title “**Podiatric Surgeon**” for the reasons outlined earlier, if an alternative title is absolutely necessary, my suggestion would be “**Foot and Ankle Surgeon**”. Here’s how this title achieves the same goal of providing greater clarity to consumers, while preserving the essence of the podiatric surgical specialty:

1. **Clear Identification of Surgical Expertise:** The title “Foot and Ankle Surgeon” directly conveys that the practitioner specializes in surgical interventions related to the foot and ankle. This provides patients with immediate clarity about the practitioner’s scope of practice and expertise without creating confusion between surgical and non-surgical podiatrists. The title places the surgical aspect at the forefront, much like “Orthopaedic Surgeon” focuses on musculoskeletal surgery, but with a clear focus on the anatomical region of the foot and ankle. This makes it easier for patients to distinguish a surgical specialist from a general podiatrist.
2. **Alignment with Other Surgical Specialties:** Titles in other surgical fields, such as “Neurosurgeon” or “Cardiothoracic Surgeon,” reflect a combination of anatomy and surgical specialization. “Foot and Ankle Surgeon” follows this well-established convention, aligning podiatric surgery with other recognized surgical disciplines. This consistency reduces any ambiguity about the surgeon’s role and helps ensure that patients understand they are receiving care from a surgical specialist with advanced training specific to a particular anatomical region.
3. **Avoiding Ambiguity with Non-Surgical Roles:** The term “Surgical Podiatrist” could still be confusing to patients, as it does not clearly separate a specialist in surgery from other podiatrists who do not perform surgery but provide general podiatric care. “Foot and Ankle Surgeon,” on the other hand, is specific enough to avoid overlap with non-surgical podiatric roles, maintaining the necessary distinction between surgery and general care. It reinforces the practitioner’s role as a surgeon rather than a generalist, ensuring clarity for consumers.
4. **Maintaining Trust and Professional Recognition:** A title like “Foot and Ankle Surgeon” maintains the professional integrity and recognition that comes with being a surgical specialist. It retains the stature associated with being a surgeon, which is important for both public perception and interprofessional collaboration. Patients place significant trust in surgeons, and this title ensures that the depth of training and expertise involved in podiatric surgery is clearly communicated, thereby preserving patient confidence.
5. **Focusing on the Anatomical Specialty:** The title “Foot and Ankle Surgeon” highlights the anatomical region of focus, which aligns with the general public’s understanding. Most patients seek podiatric surgeons for conditions affecting their foot and ankle, and this title provides them with an immediately clear understanding of the specialist’s area of expertise. Additionally, it helps differentiate podiatric surgery from other forms of surgery that might overlap with foot

and ankle care, such as orthopaedic surgery, without diminishing the podiatric surgeon's unique expertise.

In summary, "**Foot and Ankle Surgeon**" would achieve the same intended clarity as "Surgical Podiatrist" but in a way that preserves the integrity of the surgical specialty, aligns with established norms in other surgical fields, and avoids confusion between surgical and non-surgical roles. It emphasizes the surgical nature of the role while making the anatomical focus clear, which ensures that patients, healthcare providers, and regulatory bodies can easily understand the practitioner's expertise.

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

The proposed change in title from "**Podiatric Surgeon**" to "**Surgical Podiatrist**" could have several potential impacts for consumers, most of which would likely be negative, potentially undermining patient understanding, trust, and overall access to specialized care. Here are the key potential impacts:

#### 1. Confusion and Misunderstanding of Expertise:

One of the most significant risks is that consumers may become confused about the level of surgical expertise associated with the new title. The term "**Podiatric Surgeon**" clearly conveys that the practitioner is a surgical specialist, whereas "**Surgical Podiatrist**" blends the surgical role with general podiatry. This could lead to patients questioning whether the practitioner is primarily a podiatrist who occasionally performs surgery or a fully trained surgeon specializing in foot and ankle conditions. This confusion could result in patients being unsure whether they are receiving care from a highly qualified surgeon or a general practitioner with limited surgical capabilities.

For many patients, surgery is a significant decision, and clarity about their surgeon's qualifications is essential for building confidence. If patients do not understand the true scope of the practitioner's surgical expertise, they may be less likely to seek care, delay treatment, or question the quality of care they receive.

#### 2. Erosion of Trust in Podiatric Surgeons:

Trust is a key factor in the patient-practitioner relationship, particularly in surgical settings where patients are entrusting their health and safety to the hands of a skilled professional. The title "**Podiatric Surgeon**" conveys a sense of specialization and advanced training that reinforces patient trust. Changing this title to "**Surgical Podiatrist**" could diminish that trust by implying that the practitioner is less specialized in surgery than the current title suggests. This erosion of trust could lead to hesitancy in seeking treatment or second-guessing the surgical options available from podiatric surgeons.

Additionally, the proposed title change may lead consumers to believe that the practitioner is less competent than other types of surgeons, such as orthopaedic surgeons, even though podiatric surgeons have undergone years of rigorous training to achieve their surgical expertise. This could lead to a preference for non-podiatric specialists, even when a podiatric surgeon would be the most appropriate and skilled provider for the patient's needs.

#### 3. Disruption in Referral Patterns and Access to Care:

The change in title may lead to confusion not only for consumers but also for other healthcare providers who refer patients to podiatric surgeons. Referring practitioners, such as general practitioners (GPs) or other specialists, rely on titles to guide referrals and ensure that patients are directed to the appropriate care provider. If "**Surgical Podiatrist**" does not convey the same level of surgical specialization as "**Podiatric Surgeon**," it could lead to fewer referrals to podiatric surgeons, limiting patients' access to the most suitable surgical specialist for their condition.

Furthermore, this title change could lead to patients being unnecessarily referred to orthopaedic surgeons or other specialties for conditions that would be more appropriately managed by a podiatric

surgeon. This could result in delayed treatment, increased healthcare costs, and potential frustration for patients who are not directed to the most qualified specialist for their foot and ankle issues.

#### **4. Impact on Patient Safety and Outcomes:**

In a scenario where patients are unsure of their provider's qualifications or misunderstand the scope of their expertise, they may delay seeking care or opt for providers they perceive to be more specialized, even when those providers are not the best fit for their condition. Delayed or inappropriate care could lead to worsening foot and ankle problems, increased complications, and potentially poorer health outcomes.

For example, patients with conditions like diabetic foot ulcers, complex fractures, or severe bunions might delay surgery if they are uncertain about the qualifications of a "Surgical Podiatrist," believing they need to wait for a "real" surgeon. This could lead to disease progression, increased risk of infections, and other complications that might have been avoided with timely, specialized care.

#### **5. Decreased Recognition of Podiatric Surgery as a Distinct Specialty:**

The title change could also undermine the recognition of **podiatric surgery as a distinct and advanced specialty** within the healthcare system. The current title, "**Podiatric Surgeon**," signifies that these professionals have attained a high level of specialized training comparable to other surgical specialties. Changing this to "**Surgical Podiatrist**" might signal to the public that podiatric surgery is a lesser form of surgery or somehow not on par with other surgical disciplines.

Over time, this decreased recognition could erode the standing of podiatric surgeons within the broader medical community, leading to fewer collaborative opportunities with other healthcare providers and even potential reductions in funding, research, and innovation in the field of podiatric surgery.

#### **6. Increased Fragmentation of Care:**

With the new title, there could be more fragmentation in foot and ankle care. Patients may mistakenly believe they need to see a general podiatrist for non-surgical issues and a different type of specialist for surgery, leading to unnecessary splitting of care. In reality, podiatric surgeons provide comprehensive care, managing both medical and surgical aspects of foot and ankle conditions. The title change could undermine this holistic model, making patients less likely to seek the continuity of care they need from a single, highly trained specialist.

The proposed change to the title "Surgical Podiatrist" introduces multiple potential negative impacts for consumers, including confusion about the practitioner's expertise, diminished trust in podiatric surgeons, and a potential reduction in appropriate referrals and access to specialized care. Furthermore, this change risks compromising patient safety and health outcomes, as well as undermining the recognition of podiatric surgery as a distinct, respected specialty. For these reasons, it is essential to carefully consider the ramifications for consumers before making any changes to the title of podiatric surgeons.

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

The proposed change in title from “Podiatric Surgeon” to “Surgical Podiatrist” could have significant impacts on podiatric surgeons, both professionally and financially. Here are the key potential impacts, including costs, that may arise from this change:

#### 1. Erosion of Professional Identity and Recognition:

One of the most immediate impacts would be the dilution of professional identity. The title “Podiatric Surgeon” carries weight, clearly identifying podiatric surgeons as highly specialized professionals within the broader field of surgery. Changing this title to “Surgical Podiatrist” may reduce the perceived level of specialization, both among colleagues in the healthcare system and within the public domain. This could lead to a loss of professional prestige, impacting the way podiatric surgeons are viewed by their peers, other medical professionals, and patients.

Podiatric surgeons have worked hard to establish their role as specialists within the healthcare system, and altering the title could undo years of progress in this area. A diminished professional identity could lead to a reduction in collaborative opportunities with other healthcare providers, affecting their ability to participate in multidisciplinary teams or be considered equal partners in complex cases involving foot and ankle pathology.

#### 2. Decreased Patient Referrals:

The title “Podiatric Surgeon” is a clear signal to other healthcare providers—such as general practitioners (GPs), orthopaedic surgeons, and other specialists—that a podiatric surgeon is the go-to expert for surgical care of the foot and ankle. By changing the title to “Surgical Podiatrist,” the referral patterns may shift. Other medical professionals might not recognize a “Surgical Podiatrist” as a surgical specialist, leading to a decrease in referrals. GPs, in particular, may prefer to refer patients to orthopaedic surgeons rather than podiatric surgeons, perceiving the new title as less specialized or qualified in surgery.

**Financial Impact:** Fewer referrals directly impact the podiatric surgeon’s practice, leading to a potential decrease in patient volume, surgical caseload, and revenue. This would also affect allied health professionals who work closely with podiatric surgeons, such as surgical nurses, rehabilitation specialists, and other support staff.

#### 3. Lowered Patient Confidence:

Patients often rely on professional titles to gauge the expertise and trustworthiness of healthcare providers. The term “Podiatric Surgeon” immediately signals to the patient that the provider has undergone extensive training in surgery, giving them confidence in the surgeon’s skills. Changing the title to “Surgical Podiatrist” may lead to confusion among patients, who could question whether the practitioner is truly a specialist in surgery or primarily a general podiatrist with some surgical capability.

**Financial Impact:** Reduced patient confidence may lead to fewer patients choosing to undergo surgery with podiatric surgeons, opting instead for orthopaedic surgeons or delaying surgical intervention. This could result in a significant reduction in revenue for podiatric surgeons, especially for those who rely on elective surgeries as a primary source of income.

#### 4. Potential Reduction in Surgical Privileges:

Hospitals and surgical centers often grant privileges based on clearly defined qualifications and recognized titles. The title “Podiatric Surgeon” aligns with other surgical specialties, such as “Orthopaedic Surgeon” or “Neurosurgeon,” and reflects the practitioner’s ability to perform specialized surgical procedures. By changing the title to “Surgical Podiatrist,” there is a risk that hospitals and surgical centers may question or reduce the scope of privileges granted to podiatric surgeons. Administrators may view the new title as a step down in specialization and restrict access to certain surgical facilities or procedures.



Financial Impact: A reduction in surgical privileges would lead to fewer surgical cases for podiatric surgeons, limiting their practice and income potential. It could also increase costs, as podiatric surgeons might need to invest in establishing private practices or outpatient surgery centers to continue offering their full range of services.

#### 5. Increased Costs for Rebranding and Compliance:

A title change would necessitate significant rebranding efforts for podiatric surgeons, who would need to update all marketing materials, practice signage, business cards, websites, and digital presence to reflect the new title. This includes updating credentials and communication with patients, colleagues, and referring providers to explain the title change.

Financial Impact: The cost of rebranding could be substantial, particularly for surgeons with established practices and a large patient base. Practices would need to invest in new materials, potentially undergo legal consultations, and allocate time and resources to manage the transition. This could represent a significant financial burden, particularly for small or independent practices.

#### 6. Impact on Professional Relationships and Advocacy:

Podiatric surgeons have built strong professional relationships with other specialists, regulatory bodies, and professional organizations based on the recognition of their title and expertise. Changing the title to “Surgical Podiatrist” could strain these relationships, as the new title may not carry the same weight in professional circles. It could also affect the podiatric surgeon’s ability to advocate for their profession and patients, as a less specialized title may limit their influence in healthcare policy discussions, academic contributions, and interdisciplinary research efforts.

Financial Impact: Diminished influence in professional settings could affect funding for podiatric surgical research, opportunities for professional development, and access to grants and educational resources, potentially stunting the growth and innovation of the field.

#### 7. Challenges in Defining Scope of Practice:

The title “Surgical Podiatrist” blurs the line between general podiatry and specialized surgery, potentially complicating the scope of practice for podiatric surgeons. It may lead to increased scrutiny or oversight from regulatory bodies, as the new title might not clearly delineate which surgical procedures are within the scope of podiatric surgeons versus other surgical specialists. This ambiguity could invite turf wars with orthopaedic surgeons and other surgical specialists, leading to legal and regulatory challenges.

Financial Impact: Legal disputes or challenges to scope of practice could result in costly litigation, professional advocacy expenses, or additional certifications and training requirements. This could increase operational costs for podiatric surgeons, making it more expensive to maintain their practice and credentials.

#### 8. Potential Loss of Competitive Advantage:

Podiatric surgeons provide a unique service, often competing with orthopaedic surgeons for foot and ankle surgeries. The title “Podiatric Surgeon” gives podiatric surgeons a competitive advantage by clearly indicating their specialization. Changing the title to “Surgical Podiatrist” could reduce this competitive edge, making it harder for podiatric surgeons to differentiate themselves from orthopaedic surgeons or general podiatrists.



Financial Impact: Losing competitive advantage may lead to fewer surgical cases and lower revenue, as patients and referring providers may choose orthopaedic surgeons over podiatric surgeons, believing they are more specialized or capable of providing better care.

The proposed title change from “Podiatric Surgeon” to “Surgical Podiatrist” carries significant risks and costs for podiatric surgeons. These include potential loss of professional identity, decreased patient referrals, erosion of trust, legal challenges, increased costs of rebranding, and a diminished competitive advantage. The financial and professional repercussions could be substantial, particularly for surgeons who have worked hard to establish their reputation and patient base under the current title. Maintaining the title “Podiatric Surgeon” is essential for preserving the integrity, recognition, and financial stability of the profession.

## 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 from “**Podiatric Surgeon**” to “**Surgical Podiatrist**” may have several **unintended consequences**, many of which could negatively affect both patients and the podiatric surgeons who have already established their careers under the title “**Podiatric Surgeon**.” These professionals have invested years of rigorous education and training to earn a recognized surgical qualification, and the title change could lead to significant personal, professional, and financial repercussions.

### 1. Devaluation of Graduates' Qualifications:

Podiatric surgeons who have graduated with the title “**Podiatric Surgeon**” have undergone specialized training to perform complex surgical procedures on the foot and ankle. Changing the title to “**Surgical Podiatrist**” could unintentionally devalue their qualifications by diminishing the perception of their expertise. The new title may imply that they are general podiatrists who perform surgery, rather than fully qualified surgical specialists. This could undermine the significance of their training and achievements.

- **Unintended Consequence:** Graduates may feel that their hard-earned qualification no longer carries the same weight or prestige. This could lead to a loss of professional identity and frustration, as they may feel that their specialized role is being diluted by a title that does not fully reflect their surgical expertise.

### 2. Professional Reputational Impact:

Many podiatric surgeons have built strong reputations as surgical specialists under the title “**Podiatric Surgeon**.” Changing this to “**Surgical Podiatrist**” may lead to confusion among colleagues, referring practitioners, and patients regarding the surgeon’s level of expertise. The new title could be perceived as a step down in specialization, leading other healthcare providers to question whether these professionals are true surgical specialists or simply podiatrists who occasionally perform surgery.

- **Unintended Consequence:** Podiatric surgeons may need to re-establish their credibility and standing in the medical community, which could lead to fewer referrals from general practitioners (GPs) or other specialists. This could reduce their patient volume, negatively impact their surgical caseload, and erode their professional reputation.

### 3. Confusion Among Patients and Erosion of Trust:

Patients often rely on professional titles to gauge the expertise of their healthcare providers. The title “**Podiatric Surgeon**” clearly conveys that the practitioner is a surgical specialist with advanced training in foot and ankle surgery. Changing the title to “**Surgical Podiatrist**” could confuse patients,

causing them to question whether their provider is a qualified surgeon or simply a general podiatrist with some surgical skills. This shift could undermine the trust patients place in their podiatric surgeon.

- **Unintended Consequence:** Patients may hesitate to seek care from a **“Surgical Podiatrist”** or may opt for an orthopaedic surgeon, believing that the latter is more specialized. This could result in fewer surgical cases for podiatric surgeons, decreased patient retention, and overall lower patient satisfaction.

#### **4. Impact on Credentialing and Employment:**

Hospitals and healthcare institutions often grant surgical privileges based on professional titles and qualifications. Podiatric surgeons with the title **“Podiatric Surgeon”** may find that their credentialing processes become more complicated if their title changes to **“Surgical Podiatrist.”** This could cause delays in obtaining or renewing surgical privileges, as healthcare administrators may question whether the new title reflects the same level of expertise as the previous one.

- **Unintended Consequence:** Podiatric surgeons may face additional administrative hurdles and potential restrictions on the scope of their surgical privileges. This could limit their opportunities to perform surgeries, reduce their income, and potentially complicate their employment prospects. In some cases, hospitals or surgical centers may require additional documentation or clarification of their qualifications, adding unnecessary burdens to their practice.

#### **5. Rebranding and Financial Costs:**

A title change would necessitate significant rebranding for podiatric surgeons who have already established their practices under the title **“Podiatric Surgeon.”** These professionals would need to update business cards, signage, websites, and marketing materials to reflect the new title. Additionally, they may need to communicate the title change to their patient base and referring providers, which could disrupt the efficiency of their practice.

- **Unintended Consequence:** The cost of rebranding could be substantial, especially for those running private practices. This financial burden would add to the frustration of practitioners who feel that the title change is unnecessary and diminishes their professional standing. Moreover, the time and resources spent on rebranding could take away from patient care and business development.

#### **6. Potential Reduction in Patient Referrals and Competitive Edge:**

The title **“Podiatric Surgeon”** gives these professionals a clear competitive advantage over general podiatrists and other healthcare providers who treat foot and ankle conditions. It signals to patients and referring doctors that the practitioner is a surgical specialist with the highest level of expertise in foot and ankle surgery. Changing the title to **“Surgical Podiatrist”** may blur the distinction between podiatric surgeons and general podiatrists, leading to a reduction in referrals from GPs and other specialists.

- **Unintended Consequence:** Podiatric surgeons could lose their competitive edge in the market, particularly in comparison to orthopaedic surgeons, who are also involved in foot and ankle surgery. This could result in fewer surgical cases, reduced patient volume, and financial losses for podiatric surgical practices. Additionally, podiatric surgeons may face increased competition from general podiatrists, as the new title may not clearly reflect the advanced level of training and specialization they possess.

#### **7. Challenges in International Recognition and Mobility:**

The title **“Podiatric Surgeon”** is well-recognized internationally, particularly in countries such as the United States, the United Kingdom, and Canada, where podiatric surgery is an established and respected specialty. A change to **“Surgical Podiatrist”** could create confusion and reduce recognition abroad, making it more difficult for Australian podiatric surgeons to obtain professional recognition or surgical privileges in other countries.

- **Unintended Consequence:** Podiatric surgeons seeking international practice opportunities, collaborations, or academic positions may face challenges in having their qualifications recognized. The new title may not carry the same weight or convey the same level of expertise as **“Podiatric Surgeon,”** potentially limiting their ability to participate in international research, clinical practice, or educational exchanges.

The proposed change from **“Podiatric Surgeon”** to **“Surgical Podiatrist”** could have profound unintended consequences for both current podiatric surgeons and those who have already graduated with the **“Podiatric Surgeon”** title. These consequences include devaluation of their qualifications, confusion among patients and healthcare professionals, potential loss of professional standing, increased financial burdens for rebranding, challenges with credentialing, and a potential reduction in patient referrals. Furthermore, this change could negatively impact podiatric surgeons' competitiveness in the job market and complicate international recognition. The Board must carefully consider these unintended consequences, as they could undermine both the professional identity of podiatric surgeons and the quality of care available to patients.

## 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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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.

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**Consultation closes on 8 November 2024.**

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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.

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

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

☒ Myself

Name: Loretta Fenney

Contact email: [REDACTED]

#### 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 support the proposed title change to 'surgical podiatrist.' The rationale provided—enhancing public safety—appears to be more politically motivated than grounded in empirical evidence. This change risks undermining the extensive training and specialised skills of podiatric surgeons, potentially leading the public to perceive these professionals as having qualifications equivalent to those of general podiatrists. It is essential to recognise that changing the title does not inherently improve patient safety and may inadvertently diminish the perceived expertise of podiatric surgeons, reducing their recognition and utilisation in clinical practice.

### 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 do not propose an alternative title, as I believe the current designation of 'podiatric surgeon' effectively encapsulates the role and expertise of these practitioners. There is no compelling evidence to suggest widespread public confusion regarding this title. Rather than altering titles, a more effective approach would be to invest in public education initiatives that clarify the distinctions between podiatric surgeons and other healthcare professionals, such as general podiatrists and orthopaedic surgeons. Enhancing public awareness could mitigate any misconceptions without necessitating a title change.

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

The proposed title change could have several detrimental impacts on consumers:

- **Increased Costs:** By reducing competition with orthopaedic surgeons, this change may lead to higher prices for surgical services, thereby affecting accessibility for patients seeking care.
- **Confusion Regarding Qualifications:** The title 'surgical podiatrist' could create ambiguity about the qualifications and training of podiatric surgeons, potentially leading patients to question the level of care they receive.
- **Diminished Trust:** A lack of understanding among general practitioners about the scope of practice for podiatric surgeons could result in fewer referrals, which would limit patient access to necessary surgical interventions.
- **Reduced Choices:** Maintaining a variety of surgical options is crucial for patient autonomy. The proposed change could restrict the choices available to patients, ultimately undermining their ability to select the most appropriate provider for their needs.

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

'The pursuit of exclusive privileges by one group at the expense of another' is the perfect way to summarise this situation.

The title change poses significant risks to the profession of podiatric surgery. It may:

- **Undermine Professional Recognition:** By potentially diminishing the status of podiatric surgeons, this change could lead to a decrease in patient referrals and trust in their expertise.
- **Economic Implications:** Reduced recognition may lead to diminished market share for podiatric surgeons, ultimately affecting their income and professional viability.
- **Stunted Growth of the Profession:** As confusion regarding the role of podiatric surgeons increases, opportunities for professional development and growth within the field may be curtailed.

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

It appears that the Board may not have fully considered the negative ramifications for podiatric surgeons in their attempt to address concerns raised by the AMA. This proposed title change could inadvertently empower orthopaedic surgeons, thereby reducing the recognition and viability of podiatric surgery as a specialty. Such a shift could lead to a decrease in the number of practising podiatric surgeons, ultimately impacting patient access to specialised care and the diversity of surgical options available in the healthcare system.



## 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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**Consultation closes on 8 November 2024.**

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**Published submissions will include the names of the individuals and/or the organisations that made them, unless confidentiality is requested.**

### 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.](#)

x Myself

Name: Richard Freihaut

Contact email: [REDACTED]

#### Question B

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

X A registered health practitioner?

Profession: Orthopaedic surgeon

☐ A member of the public?

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

#### Question C

Would you like your submission to be published?

X 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. Surgical podiatrist creates confusion in that the term "surgical" infers the practitioner is a surgeon and the general public assumes a surgeon is doctor. 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.

### 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. Operative Podiatrist. This allows the public to know the practitioner is a podiatrist who performs operative procedures without misleading them into thinking the practitioner is a surgeon and hence doctor.

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

Operative podiatrist ensures patients are not misled.

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

They will be able to practice without the risk of litigation from an unhappy patient once they find out the practitioner is not a doctor.

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

If the term Surgical Podiatrist is adopted patients will still be misled.

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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: Fadel Ghazi

Contact email: [REDACTED]

#### 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?

No, we do not agree with the change.

1. "Podiatric surgeon" is suitable given the straightforward linguistic notion that a surgeon is an individual who performs surgery. While one might argue that the alternative term, 'surgical podiatrist,' is also linguistically valid, it is not consistent with other similar terminologies. For instance, we refer to dental surgeons, not surgical dentists. Additionally, this term is not commonly used by the professional bodies or the training institutions that represent these practitioners, and hence, it does not effectively fulfill its descriptive function. This perspective is consistent with Menz's argument presented in his paper titled "Foot" and "surgeon": a tale of two definitions (2010), where he critiques the concept of 'surgical podiatrist' as flawed in differentiation from 'podiatric surgeon'. He continues to explain in a logical manner the adjective 'surgical' can be defined as 'relating to or used in surgery', which infers that the podiatrist is performing surgery, and the noun for someone who performs surgery is, of course, 'surgeon.'

It is also not evident that the use of the term 'podiatric surgeon' implies, or is intended to imply, that the practitioner is medically qualified rather than qualified in podiatry, nor that it is designed to confuse or deceive. Podiatric Surgeon is the most accurate and succinct title given our specialist training, qualification and activity.

2. International precedents support the use of the title 'surgeon' for professionals with specialised surgical training, even if they do not hold a traditional medical degree.

Maintaining this title for such professionals promotes professional equality and acknowledges the significant contributions to healthcare, ensuring that all skilled and regulated practitioners are recognised and respected for their expertise in their respective surgical domains.

We should be continuing to align with our peers internationally, where in the UK, the Health Professions Council (HPC) clearly acknowledged that the terms 'consultant podiatric surgeon' and 'podiatric surgeon' are used within the National Health Service over the last 24 years, and that podiatric surgeons are employed in that capacity, and currently use the title. The USA have also been using the term Podiatric Surgeon for decades.

3. Avoiding ambiguity is also a consideration. “Surgical Podiatrist” may sound more like a podiatrist who occasionally performs surgery, whereas “Podiatric Surgeon” makes it clear that surgery is a central part of the professional’s expertise.

**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, we do have an alternative. Particularly given that Professor Paterson has made it explicitly clear that “there needs to be a strong justification for restricting the use of title ‘surgeon’. The rationale for restricting the use of the term should be to reduce consumer confusion and potential harm, on the basis that this cannot be achieved by less directive means”

We believe that less directive means have been overlooked and the decision to restrict the use of the title ‘surgeon’ has been recommended without considering other less directive means to address consumer confusion.

The alternative suggestion is outlined in detail below:

Adding a descriptor such as specialist podiatrist after Podiatric Surgeon, as part of an overall patient education campaign is expected to provide the clarity for consumers of healthcare in understanding who it is they are seeing, without down playing the importance of the true role of podiatric surgeons.

The title would appear as: Joe Bloggs Podiatric Surgeon (Specialist Podiatrist).

Statement of Purpose - Patient Information Campaign

The purpose behind the development of this literature (in the form of brochures and clarification statements) is to remove any and all public and stakeholder confusion in relation to the title ‘Podiatric Surgeon’, explicitly outline our training and clearly show that we are not medical doctors. In addition to clear, unambiguous and explicit patient information brochures, the ACPS will also mandate the inclusion of what a Podiatric Surgeon is and isn’t in all patient referral pads, patient registration forms and consent to surgery forms. This has been specifically developed to ensure that patients and stakeholders are entirely clear about who they are seeing and who is delivering their care across the full spectrum of the patient’s journey.



## Mandatory Clarification Statements and Title Descriptor

### Patient registration and consent to surgery forms

I understand that a podiatric surgeon is a registered specialist podiatrist who is trained in the diagnosis and treatment of foot and ankle disorders by both surgical and non-surgical methods and is not a medical practitioner (medical doctor).

### Referral pads

A podiatric surgeon is a registered specialist podiatrist who is trained in the diagnosis and treatment of foot and ankle disorders by both surgical and non-surgical methods and is not a medical practitioner (medical doctor).

### Title Descriptor Podiatric Surgeon (Specialist Podiatrist)

Measures to provide transparency and clarity to consumers of healthcare include ensuring that podiatric surgeons provide full disclosure to patients as part of the pre consultation and consenting processes. This disclosure is to include information brochures provided by podiatric surgeons. Additional discussions during the consultation, ensuring that patients are well-informed and confident in their choices moving forward.

It appears that the focus groups were not a true representation of consumer understanding.

This seems to be illustrated by Professor Patterson from the following excerpts:

- When Professor Paterson asked the consumer focus groups what it meant if someone called themselves a podiatric surgeon, most participants said they would assume the practitioner was a medical practitioner and had been to medical school.

Participants in the focus groups stated that the most important part of the title is the word 'surgeon.'

However, in the very next paragraph and by contrast, Professor Paterson goes on to say:

On the other hand, patients who were referred to a podiatric surgeon by a podiatrist reported understanding that they were seeing a well-qualified practitioner who "specialises in ankles and feet".

The issues raised around the title 'podiatric surgeon' do not relate to the standard of care provided by the podiatric surgeon. Rather, they relate to clarity and transparency for the consumer about the type of practitioner they are seeing, and the type of training the practitioner has completed. This is important information to allow a consumer to make an informed decision about who will provide their care.

And therefore, if we revert back to professor Paterson's earlier statement "The rationale for

restricting the use of the term should be to reduce consumer confusion and potential harm, on the basis that this cannot be achieved by less directive means”

Then, the ACPS as an organisation, through mandated consent and patient registration statements, title descriptors, patient information brochures and a broader public information campaign have offered a viable solution to reduce consumer confusion by less directive means.

Professor Paterson's impression from interviews with podiatric surgeons is that most explain their qualifications to patients – that they are not a medical practitioner but have specialist training in podiatric surgery. “In my meetings with patients who had consulted a podiatric surgeon, they confirmed that they had received a satisfactory explanation of the practitioner's qualifications and experience. However, that is clearly not a universal experience.”

This can be made more universal with the proposed plan outlined above. The ACPS also stands ready to undertake a broader media campaign, with or without Government agencies, using the above materials to ensure there is wider dissemination of who podiatric surgeons are, how they are trained, what they practice and how they differ from medical doctors.

In combination with the above patient information and based upon the same principles as described above, other suggested titles that have been considered may include:

- Podiatry Surgeon
- Podiatric Surgeon (Surgical Podiatrist)
- Podiatric Surgeon (Podiatrist Practicing Podiatric Surgery) as implemented in the UK
- Podiatric (foot and ankle) Surgeon (Specialist Podiatrist)

We think its important to highlight that the above suggestions are being made in light of the findings and suggestions made by Queensland Parliament's Health and Environment Committee when considering the Health Practitioner Regulation National Law (Surgeons) Amendment Bill 2023. This was highlighted in Professor Paterson's review:

“Restriction on the use of the title ‘surgeon’ was considered extensively during the consultations undertaken in 2021, 2022 and 2023 on the Surgeons Bill. Although ‘podiatric surgeon’ was out of scope, the appropriateness of this protected title was raised by several stakeholders in submissions to Queensland Parliament's Health and Environment Committee. Health ministers gave extensive consideration to this issue but were not

persuaded of the need to restrict the use of the title 'surgeon', noting that 'oral surgeon' and 'podiatric surgeon' are specialist titles recognised in the National Law for suitably qualified dentists and podiatrists".

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

1. We are concerned that any change in title that falls short of 'Podiatric Surgeon' would undermine the seriousness of our work, posing more significant risks to patient safety than any error in confusion of title. Reducing the title could lead patients to underestimate the complexity and seriousness of the surgeries performed, potentially resulting in them not taking the necessary post operative or follow-up care seriously. This misperception could lead to dangerous outcomes, making it crucial to maintain a title that fully reflects the critical nature of our profession.
2. Additionally, using the title 'surgeon' helps in setting clear expectations for patients. It communicates that the individual has met rigorous standards of training and competency in their specific field, ensuring public trust and confidence in their abilities. By recognising podiatric surgical professionals as surgeons, the healthcare system validates our role and underscores the critical contributions to patient care.
3. If the title change is perceived as a downgrade by consumers, it could erode public confidence in the profession, impacting patient willingness to seek care.
4. If the new title leads to misunderstandings, it could inadvertently limit patient access to care, as some may seek out traditional "surgeons" instead.
5. Consumers may encounter further confusion if other non-medical practitioners, such as Dental and Oral Surgeons, are allowed to continue using the title 'surgeon' while other suitably qualified practitioners are not.

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

## 1. Rebranding Costs

☐ Marketing Materials: Updating websites, business cards, brochures, referral pads and signage to reflect the new title can incur significant costs.

☐ Public Education: Developing campaigns to inform patients and the public about the new title may require funding and considerable time for outreach efforts.

## 2. Administrative Expenses

☐ Legal Fees: If the title change requires legal adjustments or new registrations, there could be costs associated with consulting legal experts.

☐ Regulatory Compliance: Updating documentation with regulatory bodies may incur administrative costs.

## 3. Impact on Patient Trust and Retention

☐ Patient Confusion: Changes in title might confuse existing and potential patients, leading to a decline in patient retention and new patient acquisition.

☐ Marketing Impact: Reduced trust could necessitate additional marketing efforts to reassure patients about the quality of care.

## 4. Insurance and Reimbursement Issues

☐ Claims Processing: Adjustments in title could complicate claims with insurers, leading to delays and potential loss of revenue during the transition period.

☐ Negotiation with Insurers: Podiatric surgeons may need to renegotiate contracts with insurers, which could lead to reduced reimbursements or increased administrative burden.

## 5. Training and Education Costs

☐ Curriculum Changes: If the title change necessitates updates in educational programs, there could be costs associated with curriculum redesign and implementation.

☐ Continued Education: Practitioners may need additional training to align with the new title's implications, incurring further costs.

## 6. Professional Identity and Morale

☐ Impact on Workforce: Changes in professional identity could affect job satisfaction and morale among practitioners, potentially leading to higher turnover rates.

☐ Professional Relationships: Adjustments in how podiatric surgeons are perceived by other healthcare professionals could strain interdisciplinary collaboration.

## 7. Legal and Liability Considerations

☐ **Liability Issues:** A change in title might raise questions about the scope of practice, leading to potential liability concerns or increased malpractice insurance costs.

#### 8. Operational Adjustments

☐ **Staff Training:** Staff may need training to understand and communicate the changes effectively to patients, leading to additional costs.

#### 9. Time and Resource Allocation

☐ **Management Resources:** Significant time and effort may be required to implement the changes, diverting focus from patient care and practice growth.

#### 10. Registrar retention and recruitment

☐ **Current and potential podiatric surgical trainees** may lose interest in continuing or entering the profession on account of the lack of professional recognition (in the form of title attainment) following completion. This would have a devastating impact upon the profession and is counter to Professor Paterson's assertion that the profession should be positioned to flourish, not flounder.

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

1. Changing the title will lead to further decreased competitiveness within healthcare settings, and provide an unfair competitive advantage and monopolistic market conditions for orthopaedic surgeons. This is despite the review finding that no changes in podiatric surgeons' scope of practice are necessary and the work that we undertake is largely the same.

2. As a consequence of point 1 above, as a result of this unfair competitive advantage, a Podiatric Surgeon's income may be significantly impacted with the likely loss of tens of thousands of dollars annually.

3. Changing title also unfairly results in collective punishment when, as identified by Professor Patterson, the majority were not responsible for the higher notifications as highlighted by the direct quotes below.

"Concerningly, 66% of the notifications received about podiatric surgeons over that period relate to nine podiatric surgeons who were each the subject of three or more notifications"

AND;

"I am satisfied that a significant proportion of notifications about podiatric surgeons were

prompted by orthopaedic surgeons who reviewed the patient following podiatric surgery”

4. Importantly, it should also be stressed that the review found that one of the key elements of the title surgeon revolves around “social prestige”, which carries with it ‘symbolic capital’ and gives privilege to one group, which in turn will have an anti-competitive effect. Indeed, this is further re-enforced by Professor Paterson’s following assertion:

“Any notification, especially about the standard of clinical care, needs to be assessed carefully by a regulator. However, it is a notable feature of the notifications about podiatric surgeons that many come from or have been triggered by another group of health practitioners – orthopaedic surgeons – who perform similar work and are competitors. The hostility and professional rivalry between podiatric surgeons and orthopaedic surgeons is longstanding and well documented.

5. There is no published evidence to suggest that title change will make Podiatric Surgeons any safer than they already are. This may result in legal action from one or many Podiatric Surgeons (not sure if we should put this in).

6. Public Confusion: Given that Podiatric Surgeons have been using the title ‘Podiatric Surgeon’ for many decades (14 years of which were after approval by the Health Minister in 2010), patients and stakeholders alike may not understand the new title (or even be led into think it is an entirely new profession), leading to misunderstandings about the qualifications and expertise of practitioners.

7. Loss of Trust: If the title change is perceived as a downgrade, it could erode public confidence in the profession, impacting patient willingness to seek care.

8. Insurance and Reimbursement Issues: Changes in titles may complicate insurance premiums, claims and reimbursements, as insurers may not recognise or understand the new designation and/or be unwilling to insure ‘surgical podiatrists. This, again, may result in a significant financial burden on individuals within the profession.

9. Impact on Professional Identity: Practitioners may feel that their professional identity is diminished, which could significantly affect morale and job satisfaction.

10. Interdisciplinary Relations: The change could impact how podiatric surgeons are viewed by other medical professionals, potentially leading to friction or confusion in collaborative care settings.

11. Legal Implications: The change could raise questions about the scope of practice and

liability and have a direct impact on indemnity insurance premiums and claims.

12. Academic and Training Impacts: The change may affect educational programs and training pathways, requiring adjustments in curricula and certification processes.

13. Restricting the title from one non-medically qualified group of health professions and allowing others, such as Dental and Oral Surgeon, to continue using it represents a gross injustice and promotes inequality within the healthcare system.



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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: Dr Rob Hermann – podiatric surgeon(registered specialist). Immediate past president ACPS

Contact email: [REDACTED]

#### Question B

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

☒ A registered health practitioner?

Profession: podiatric surgery

☐ 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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☐ 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 with the proposed change of title to surgical podiatrist because there is no research evidence to support such a change. Rather it is the recommendation of one person, Professor Paterson in attempt to satisfy the concerns of the Australian Orthopaedic Association (AOA). There is abundant evidence in ARPRHA and the Podiatry Board of Australia's (PBA) records, that the AOA is vehemently opposed to podiatric surgery and has been calling for a downgrade of title for years. Such AOA demands are based on a position that public harm occurs at a higher rate for podiatric surgeons than orthopaedic surgeons. However, the Australasian College of Podiatric Surgeons has audit data of 20 000 admissions in the public domain that provides high level evidence of safe and cost-effective care. This means the evidence of quality outcomes for podiatric foot and ankle surgery is clear and available for the public and any organisation to access. In contrast there is no such data publicly available for orthopaedic surgeons. The lack of orthopaedic outcome data was identified in the MSAC submission 1344.2 public statement document. The reality is the AOA has been conflating their opposition to podiatric surgery with a small number of poor performers and outcomes within podiatric surgery. At the same time the poor outcomes and providers within orthopaedic have been ignored.

It appears that a misinterpretation has occurred regarding Professor Paterson's comments on the need for a change in title. On page 31 Professor Paterson states the title should be changed to surgical podiatrist. However, on the same page he states the matter was considered via consultation many times (2021,22 & 23) and that change was not supported by all State and the Federal Health ministers. Given the multiple times a consultation process has been run on the issue of title there is no reason that it should again be considered. What is very clear from the review is patients need to be properly informed about who podiatric surgeons are and what training they have done. On page 29 of the review, Professor Paterson noted that when patients had been appropriately referred and educated there was no confusion on the matter of title. An example of appropriate patient education exists in my New Patient Information form that has been in use since 2010. In this form is a section that clearly states the patient acknowledges and understands that I am not a medical practitioner but a registered specialist podiatric surgeon, as seen below:

*I understand Dr Robert Hermann is a podiatric surgeon and not a medical practitioner – therefore his fees are **NOT COVERED BY MEDICARE**. I confirm that I am aware of these facts.*

In addition, my office staff and I always ensure patients know that I am a registered specialist podiatric surgeon and not a medical practitioner. There is no confusion when patients are educated appropriately. Such education should be the main thrust by the Board, AHPRA and the ACPS. Public education and the integration of podiatric surgery into the broader healthcare system is the appropriate way to manage this issue. Professor Paterson has detailed the latter in his other 14 recommendations. By making such changes there will be no confusion in the public mind and appropriate care can be ensured. This will also mean the Australian public can receive foot and ankle care and so improve their quality of life. To change the title as suggested is a backward step that will make Australia look fascist in the healthcare systems of the western world. There is an abundance of evidence that change of title has been driven by the Australian Orthopaedic Association, Royal Australasian College of Surgeons and the Australian Medical Association for vested interests. The demand for foot and ankle surgery is increasing inline with the proportion of Australian who are elderly and current supply of services cannot appropriately meet demand. Integrating podiatric surgery within Australian health care by protection of title, equity of funding, supporting education, training and clinical governance that removes poor performers is a constructive and appropriate way to address this issue. Education of the public as core component of such integration will eliminate any concerns on the use of tile.

**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?**

The key is better communication and public education by the Board, the ACPS, University of WA, podiatric surgeon. Furthermore, the PBA should be supporting incorporation of podiatric surgery into the broader healthcare system and equity of funding, so the speciality is recognised like all other surgical specialities. There have been many years of requests for the Board to assist the ACPS to improve the Colleges peer review, clinical governance and request of equity of funding, all of which have not been supported. These issues need to be addressed in addition to better public education. By talking such measure every increasing demand for foot and surgery can be safely provided by podiatric surgeons.

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

Confusion, uncertainty and unnecessary delays in seeking foot and ankle surgery. There will also be an increase in notifications and civil action.

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

Loss of practice and livelihood. Increasing the significant barriers that already exist to being integrated into the Australian healthcare system.

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

The disintegration of the surgical speciality of podiatric surgery. Reducing the access to needed surgery services. Should the suggested changes be made all legal options available to podiatric surgeons will be considered to seek compensation for damages caused by such a draconian outcome.