

## 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 specialty 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**

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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 These submissions will not be published on the website or elsewhere.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.

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Initial questions
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□ Organisation
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Contact email: Click or tap here to enter text.
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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 <b>with</b> my name/organisation name
⊠ Yes, publish my submission <b>without</b> my name/ organisation name
□ No – <b>do not</b> publish my submission

1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?
No. I am comfortable with the descriptor "podiatric surgery". It is clear to me what the practitioner does and is no different in clarity of meaning from the descriptor "orthopaedic surgery". As a medical practitioner who has worked closely with orthopaedic surgeons and podiatrists, the clinical training and scope of practice for both types of practitioner is made clear by both these terms.
Any patient should be reassured that podiatric surgeons have the requisite skill to perform surgery on the foot and ankle as they are governed in clinical practice by AHPRA.
2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?
No.
3. What are the potential impacts for consumers of the proposed change in title?
I doubt consumers would be overly concerned at a change in title, as long as the scope of practice and expectations of the podiatric surgeon are met.
I suspect the push for a change in title is less about the consumer and more about the name "orthopaedic surgeon".
4. What are the potential impacts, including potential costs, for podiatric surgeons of the
proposed change in title?
I am not qualified to answer this question.

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



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1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

No I don't agree. The term podiatric surgeon accurately describes what they do.

'Surgical podiatrist' is not used as a title and has no meaning when its looked up or researched on the web.

'Podiatric surgeon' is recognized worldwide.

If Australia's Podiatric Surgeons are as qualified as their Podiatric Surgeon colleagues from overseas, then this should be the term used. It keeps it simple. Changing the title does not make it clear that the practitioner is a Podiatric Surgeon. It just becomes more confusing.

The 'protected title' is obviously not 'protected' if you are a podiatric surgeon.

2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?

Consistency worldwide of terms is key to minimize confusion especially when medical terminology is

The protected title is used for Podiatric Surgeons because of the huge amount of study and experience they have. They have earned that title.

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

Calling a Podiatric Surgeon a 'Surgical Podiatrist', makes them sound less qualified than they are.

If I saw 'Surgical Podiatrist' advertised I probably wouldn't have considered them for my surgery. It makes them sound like they would only do very minor procedures.

I am very fortunate to have met Podiatric Surgeons. At the time I was unable to walk due to a 'significant deformity' of my foot. Their skills and training enabled me to walk again.

They are 'Podiatric Surgeons, not 'Surgical Podiatrists'

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

Changing the title in any job to something that sounds of lesser value would have an incredibly damaging impact.

Podiatric surgeons are equivalent, if not more specialized in foot and ankle surgery to Orthopedic surgeons.

Podiatric surgeons are highly skilled and qualified, they should be advanced in recognition and status not regressed.

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

Once you start changing titles, how far do you go and when does it stop? Podiatric Surgeons are recognized as leaders in their field in the US. - Australia should be no different.

Excellence is usually met with promotion, not demotion.

It seems like this title change is being done to impede progress of this profession in Australia instead of encouraging and collaborating with it.

How many Podiatric Surgeons actually agree with the reasoning of this title change? Are there any?



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1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

No I don't agree.

'Surgical podiatrist' minimises the clinical skills and years of medical training the podiatric surgeon has undertaken to perform capable, competent and skillful surgery.

To be very clear, the only authorised people permitted to conduct operations in Australia are surgeons as authorised according to Australian Standards and Codes or 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?

No and I don't believe it's warranted to change their professional title on any grounds.

The title Podiatric Surgeons is accurate based on their vast clinical expertise and ongoing professional commitment to provide best care practices for their patients.

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

Calling a Podiatric Surgeon a 'Surgical Podiatrist', diminishes their qualifications and doesn't at all reflect accurately on their scope of practice.

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

Changing the title that reduces the level of skill that podiatric surgeons have and would have a devastating impact on their profession and their professional recognition.

Optimal specialised medical intervention is about providing people with options for best practice and best outcomes and this is the clinical area of a podiatric surgeon.

Every profession has a monetary value associated with it, this is an integral component of our living standards and the rationale behind advancing in skill and knowledge in an area of practice.

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

The reasoning for the change of title is poor.

Changing the professional title would be wholly detrimental to the profession that is underpinned by integrity and promotes specalised skills and practice to optimise person

centred practice that we all value and adhere to within associated clinical Codes of Practice.

There is no possible way to foresee all of the unintentional implications from the title change. The only foreseeable impact would be negative.

Podiatric surgeons have a specialised scope of practice that allows them to provide surgical interventions within Australian standards of practice.

This needs to be promoted and cited accurately as "Podiatric Surgeon", not invalidated by language of title.

The model of practice that is promoted in Australian health care networks is collaboration and supportive practice. Every member of a multi disciplinary team has a clinical title that promotes their area of skillful expertise, clinical leadership and practice wisdom.

I can't image Neurosurgeons, Neurologists, Speech Pathologist, Physiotherapist, Hematologist, Nephrologists, Oncologist or Consultants agreeing to change their profession and academic title.

Can you?

To: Podiatryconsultation

**Subject:** Public consultation on the proposed change to the protected title for the podiatry speciality of podiatric

surgery

**Date:** Thursday, 7 November 2024 8:46:03 PM

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### Your responses to the consultation questions

Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

The suggestion to change the title "podiatric surgeon" to "surgical podiatrist" has caused concern among podiatrists. "Podiatric surgeon" clearly describes a podiatrist with advanced surgical training—typically six to eight years beyond a basic podiatry degree. This change, largely backed by the orthopedic field, is not supported by evidence showing public confusion over the title; no data currently suggests that the public misunderstands these qualifications. The title "podiatric surgeon" meets global standards for foot and ankle surgery. Changing it now might lead to more confusion and reduce trust in these professionals' expertise. Instead of altering the title, the Board could focus on educating the public and promoting teamwork in patient care.

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 title "podiatric surgeon" is clear and correctly indicates a podiatrist with advanced surgical training. Instead of changing the title, the better approach would be to work with podiatric surgeons to raise public awareness through regulated advertising and education. This could include using terms like "specialist podiatrist" in promotional materials and on letterhead, in line with existing advertising guidelines.

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

Changing the title "podiatric surgeon" could have negative effects on both the profession and patients. It may give private health insurers a reason to cut coverage for podiatric surgical services, limiting patient options and creating a monopoly for the orthopaedic community. It could also worsen the difficulty podiatric surgeons face in gaining hospital access. Furthermore, using alternative titles may confuse patients, as these would not match established medical terminology.

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

Changing the title "podiatric surgeon" could have serious consequences for established practitioners, such as difficulties with rebranding, loss of referrals, reduced community recognition, and higher compliance and administrative costs. This shift may also cause emotional and psychological stress due to perceived setbacks, especially since there is no evidence to support the change. It could also discourage new recruits to the specialty, affecting succession planning and career growth. Given the long history of this title, a change at this stage could be highly disruptive, and the Board would bear ethical and moral responsibility for the impact on practitioners.

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

The proposed change from "podiatric surgeon" carries significant reputational risk for the Board, as it is not backed by evidence and goes against the principles of proportionate, risk-based regulation. This approach undermines the goals of healthcare reform, which should prioritize improving access, supporting professional recognition, and reducing barriers. The title "podiatric surgeon" accurately reflects the qualifications of these specialists, and changing it to appease competing professional groups could be seen as punitive. Such a move may also perpetuate discrimination within the Australian healthcare system, as noted in recent reports, and could hinder the development of a more flexible and inclusive healthcare workforce.



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proposed change in title?

1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

No I do not agree the title of Podiatric Surgeon needs to be changed. This has been the title used for years now. I've been using it with patients since the late 1990's. When a Podiatrist does foot and ankle surgery they are a Podiatric Surgeon it seems common sense to me. The Podiatry profession recognises this term and podiatrists are currently using it all the time. As a general podiatrist referring patients for a surgical option for treatment there was always a clear explanation and choice between a podiatric and an orthopaedic surgical option made available. Education of the options open to patients regarding foot and ankle surgery remains important yet changing the existing title of these podiatry professionals makes no sense to me. There are Podiatric Surgeons currently known and practising that use this title and have been for years. I personally have known of a podiatric surgeon who operated in a private hospital alongside an orthopaedic surgeon and there were no hassles about titles. Each speciality embracing and complimenting the other with the main aim to best benefit the patients and help these patients.

suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?
No
3. What are the potential impacts for consumers of the proposed change in title?
3. What are the potential impacts for consumers of the proposed change in title?
Confusion generally and speaking from a rural podiatric experience I believe this confusion would also touch medical practitioners and other allied health professionals like Pharmacists and Nurses that are now familiar with the title Podiatric surgeon.

2. Do you have an alternative suggestion for the protected title? If yes, how would your

surgeons and the larger number of general podiatrists that are working with them have never found the title to be an issue. Patient education is required when any referral is initiated and this ought to be the focus not a title change. Brand Intelligence is an issue-some of us have spent decades educating and mentoring the public and other professionals to understand the option of podiatric surgery using this title and I believe a title change would damage the perception currently achieved. Private Health Funds have always tried to undermine rebates for podiatry and podiatric surgery has been particularly

4. What are the potential impacts, including potential costs, for podiatric surgeons of the

Costs to everyday business with the name change on signs, paperwork, websites, printed handouts, business cards, uniforms etc. would have a negative impact on podiatry practises. To me this is not a positive healthcare reform but a backwards step. As a small but dedicated profession the podiatric

discriminated against in the past, a title change could be used to delay needed review of rebates for

private patients needing foot and ankle surgery and this has an impact on medical waiting lists and access to care, one could argue particularly in rural areas like Tasmania. The Career progression and support of podiatric surgeons who have studied for years to obtain this title is also undermined by a title change at this point. Surely, we want to support this speciality and encourage a new generation of podiatrists to broaden their scope of practise and be proud to do this. This positive feeling in any professional body always benefits patients. Happy fulfilled professionals equals pride in their important work and quality care provided which results in satisfied comfortable patients.

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

I am sure the board would have considered this but... Public perception and consistency plays such an important role in public health and trust in health providers- this certainly affects health outcomes and plays a major role in the reward of excellent medical care in any community setting. From my personal experience over the past 40 years Podiatrists are a much needed profession and in rural Australia there are never enough Podiatrists. I have found working in Tasmania employing many podiatrists over 4 decades of practise with 3 visiting Podiatric Surgeons that this small but dedicated professional speciality is committed to serving Rural Australia when the podiatrists on the home ground can support them. The public needs the option of podiatric surgery. Title changing may well interrupt the professional appreciation, reduce access to the advanced scope of diagnostic skill and treatment options and discourage availability of the professionals and this is not going to help the public with painful feet and ankles in Tasmania. Recruitment and retention of specialities in rural areas is so difficult and we need to encourage, not discourage these professionals. Please leave the title alone and lets focus on educating the patients, educators, other health professionals and other doctors alike (including orthopaedic surgeons) to better understand the education, skill and expertise available in the full scope of the podiatry profession as a whole. Embracing the speciality of podiatric surgery can only benefit the public as greater choice of treatment options is a good thing. I'm retiring this year and would be disappointed to say the least to see my 4 decades of educating and serving the public and my medical colleagues regards podiatric surgery and its significant benefits to foot health, diagnosis and cure of painful foot and ankle pathology undermined by any title change.