

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.

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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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

[REDACTED]

[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

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Your responses to the consultation questions

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

I do not agree with the proposal to change the title to 'surgical podiatrist.' It massively undermines the credibility of the profession. It makes it less clear as to the types of procedure the practitioner may perform as a majority of current podiatry patients would perceive these surgeries to be for ingrowing toenails and nothing further. This is no different to the dental profession - dental surgeons are not called 'surgical dentists,' and nor should they be.

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

No - the title should not change.

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

As said above, I feel the consumer is less likely to understand the role of a 'surgical podiatrist' within the healthcare landscape than of a 'podiatric surgeon.' This confusion will make them more inclined to seek the care of an orthopaedic surgeon, many of whom do not have the scope within their schedule to perform foot surgery - this would further burden the healthcare system and delay access to timely care. In addition, many consumers would be more likely to access care from an orthopaedic surgeon rather than surgical podiatrist due to a perceived difference in their skill set, training and expertise. It massively undermines the credibility of the profession.

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

Currently practicing podiatric surgeons will likely have to rebrand businesses and re-establish professional relationships/contacts under a new business name. This will detrimentally effect their workflow and referrals, and create confusion for referring practitioners and current patients. It also has an impact on the credibility of their training and skills within the helathcare landscape.

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

I am certain the Board has considered many of the factors above; I feel particularly strongly about the damage this change would cause to the public perception of the profession (especially regarding the expertise and level of training these practitioners have) and the negative impact current practitioners would suffer to their business and reputations.

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Your responses to the consultation questions

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

I do not agree with the proposed changes to rebrand the title of "Podiatric Surgeon" to "Surgical Podiatrist." In Australia, podiatric surgeons undergo extensive training and education, equipping them with the skills necessary to perform a wide range of surgical procedures. This rigorous training is supported by strict frameworks that ensure positive patient outcomes, which are critical in maintaining high standards of care.

The push for this title change seems to stem from professional monopolies rather than a genuine concern for patient welfare or clarity in professional roles. Maintaining the title of Podiatric Surgeon reflects the specialized expertise and extensive training that these professionals possess, and it is essential to preserve this distinction for the benefit of patients and the integrity of the profession.

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 believe the proposed change of title from "Podiatric Surgeon" will significantly restrict consumer access to medical care. This is particularly concerning for rural, lower socioeconomic status, and Indigenous populations, who often rely on accessible healthcare options. Podiatric surgeons play a crucial role in providing specialized care, and changing their title could create confusion and deter patients from seeking necessary treatment.

Furthermore, the potential for restrictions in private health/Medicare funding associated with this title change could limit the services available to these communities. Ensuring that all patients have access to high-quality care should be our priority, and this proposed change risks undermining that goal. We need to focus on enhancing access to care rather than complicating it.

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

I believe the proposed change of title from "Podiatric Surgeon" will have a detrimental impact on podiatric surgeons themselves. This change threatens to limit the scope of practice and could result in a significant loss of both respect and income for podiatric surgeons. By altering the professional designation, there is a risk of creating unnecessary barriers that may restrict practitioners' ability to provide essential surgical care.

Additionally, this shift could lead to medical gatekeeping, where patients face increased hurdles in accessing the specialized treatments. As noted in Q3, this is particularly concerning for those in rural, lower socioeconomic status, and Indigenous populations who already have limited access to healthcare services. It's crucial that we maintain the professional identity of podiatric surgeons to ensure they can continue to deliver high-quality care and support to patients.

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

The proposed name change from "Podiatric Surgeon" to "Surgical Podiatrist" could lead to a loss of respect for the profession and diminish its perceived value among the public. This rebranding might create confusion regarding the expertise and specialized training that podiatric surgeons undergo, potentially undermining patients' confidence in their abilities.

Additionally, this shift could result in funding restrictions, particularly through private health, which may limit the services available to patients. If the profession is seen as less specialized, it may not receive the necessary support to continue providing high-quality care. It will also reduce the possibility of Medicare funding in the future if the profession is seen as lesser.

Ultimately, these changes could have significant consequences for public access to healthcare. A decreased perception of the role of podiatric surgeons could deter patients from seeking essential treatments, especially in underserved communities where access to care is already limited. It is crucial to maintain recognition of their expertise to ensure that all patients receive the high-quality care they need.

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Question B

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

☒ A member of the public?

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Your responses to the consultation questions

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

No. I think this speaks to a clear bias that benefits orthopaedic surgeons whose self-interest outweighs the common good in this regard.

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

No. the title should remain

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

In my opinion, the title change seeks to subtly diminish the implied competencies of existing practitioners and drive away public patronage of them. In so doing, it would inhibit consumers from utilising the services of those practitioners who are indeed best equipped to deal with their procedural needs. It follows that broadly speaking, quality-of-consumer-care will thus be adversely affected in the process.

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

I can only speak on assumption that a less confident public would tend less to opt for podiatric surgeons for those procedures for which they otherwise would have been very comfortable to do so. Surely this would greatly impact the earning potential of these practitioners accordingly.

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

I believe that the above-mentioned point of quality-of-care diminution will be the most significant unintended consequence of the proposed name change. While I am no legal expert, it would be interesting to contemplate what legal jeopardy the Board might find itself if its insistence on this name change does in fact lead to what I purport will be compromises in both amenability to, and quality of, relevant care available to members of the general public off the back of the move.

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No I disagree.

My son has been with our Podiatrist for a number of years and we have known that he would eventually need surgery to correct his feet. As a qualified Podiatric Surgeon, the podiatrist explained to us the training he had done to gain the qualification and what surgery my son would need to correct his foot. After consideration we went ahead with the surgery, then spent several weeks visiting the Podiatrist for the follow up care. We would not have done this if we had not had confidence in our Podiatrist and the training he had undertaken to make this surgery happen. He is definitely a Podiatric Surgeon and as such the name should stay.

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?

Alternative suggestions: Podiatric Surgeon (Podiatrist Practicing Podiatric Surgery) or Doctor of Podiatric Medicine (DPM) (Foot and Ankle Surgeon).

Both titles suggest to me that the Podiatrist has undertaken the specific training program to perform feet and ankle surgery.

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

If I understand it:

A Surgical Podiatrist suggests they receive less training than a Surgeon Podiatrist to perform surgery.

A Podiatric Surgeon receives extensive training to perform feet and ankle surgery.

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

What incentive is there for a Podiatrist to undertake further extensive training if they are not going to be recognised for the work and have their qualifications acknowledged?

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

My son will eventually need further surgery, and I would lose confidence if my Surgeon Podiatrist retired and I had to find another 'Surgical Podiatrist', knowing that they may not have done the in-depth training needed for me to feel comfortable in them operating on my son, who already has multiple health problems to deal with.

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Profession: Doctor

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I do not agree with the proposal to change the title.

The training programme for podiatric surgeons is accredited, recognised and regulated by AHPRA. These surgeons have demonstrated safe practices over 50 years with a comprehensive understanding of the anatomy of physiology of the foot and ankle unique to their training. With the ever growing pressures on the health system it is imperative to have increasing numbers of trained professionals capable of meeting these demands. Podiatric surgeons perform surgery. The operations are carried out in theatre under sterile conditions and in the majority of cases require general anaesthesia. There is no more appropriate term to describe the nature of these operations and no more appropriate term than surgeon to describe those that perform them.

It is important to address the recent concerns voiced by orthopaedic surgeons about fears for public safety; these are a blatant display of anticompetitive fear mongering by a select group of orthopaedic surgeons who perform many of the same surgeries and are therefore in direct competition. Their insistence is made under a façade of concern for patient safety when there is no evidence to support the notion that podiatric surgeons pose any greater risk than their medical colleagues. The underlying agenda is obvious. There is no equivalent in other specialties to a "surgical podiatrist". Dentists who perform surgery are known as "oral surgeons" not "surgical dentists". This unfamiliar nomenclature is more likely to create confusion for consumers while simultaneously undermining the qualification that podiatric surgeons achieve through years of rigorous training.

Podiatric surgeons do valuable work and form an important component of the healthcare workforce. They have weathered many attempts to diminish their scope and position. This proposal to change their title after years of use is an unnecessary and potentially damaging measure.

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 current title is an appropriate description of the role and qualifications achieved by podiatric surgeons and should remain a protected title.

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

As a recently young doctor who has been fortunate enough to spend time in theatre with both orthopaedic surgeons and podiatric surgeons, I would in the future feel more than comfortable referring patients to either the podiatric surgeon, or orthopaedic surgeon of my choice.

I fear that potential changes to title may undermine the quality of work that my podiatric surgical colleagues perform.

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

The proposed change in title has several potential detrimental impacts for podiatric surgeons. These include but are not limited to:

1. Increased difficulty obtaining access to government (Medicare) funding for their services and to public hospitals
2. Increased costs in the form of higher insurance rates
3. Decreased business as their services are regarded as less than/as they are not regarded as surgeons

There have been no submissions by podiatric surgeons supporting this proposed change in title. The change aims to diminish the valuable work they do and threatens their livelihood.

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

While one of the primary arguments for changing the title is that of consumer safety, the change could put patients at risk of misunderstanding the nature of the operations they are about to have. Patients may not appreciate the operations they have as formal surgeries and therefore not undergo appropriate follow up with their clinician. Lack of follow up increases the risk of post operative complications such as infections.