

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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Making a submission

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Consultation closes on 8 November 2024.

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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:

Contact

☐ Myself

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

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

Question B

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

☐ A registered health practitioner?

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

☐ A member of the public?

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

Question C

Would you like your submission to be published?

☐ Yes, publish my submission **with** my name/organisation name

☒ Yes, publish my submission **without** my name/ organisation name

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Your responses to the consultation questions

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

No. Podiatric Surgeon is clearer and more understood. Also aligned with international terminology and indicates the extensive additional training and qualifications they undertake beyond that of podiatrists.

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

Podiatric Surgeon is clear.

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

Podiatric Surgeon clearly specialises in surgery of foot, ankle, and lower limbs. Podiatry is far more general services and including surgery in the name of Podiatrist in confusing.

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

Significant work to re-register the organisation, and significant work and costs to educate public and patients.

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

Should align with international naming conventions.

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Name of organisation: [REDACTED]

Contact email: [REDACTED]

☐ Myself

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Profession: Podiatric Surgeon

☐ 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. Podiatric Surgeon is credentialled within the scope of practice to operate in this hospital. A Podiatrist is unable to do surgery.

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

Podiatric Surgeon is a well-known term for the consumer.

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

Why would Podiatric Surgeon be changed and cause confusion when no other surgical speciality has been changed. Such as Ophthalmic Surgeon, General Surgeon, etc.

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

Podiatric surgery is now covered by some Health Funds and the change would impact on the hospital and patients ability to have the surgery paid by their health fund. This will impact on the hospital's income by reducing the patient admissions for this surgery.

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

This hospital has a good relationship with the Podiatric Surgeons, and we have had no reason to agree to this proposed change of title. The Medical Advisory Committee has endorsed the scope of practice for podiatric surgeons and we hope to continue to have podiatric surgeons operate at [REDACTED] as an ongoing concern.

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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?
Agree to change the protected title to 'surgical podiatrist'. Using the profession at the end of the title may make it clearer that the practitioner is a podiatrist. This is similar to 'clinical psychologist' or other allied health endorsements. This may reduce confusion if 'surgeon' at the end of the title typically refers to a medical professional in the public's perception.
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?
Short term: There may be confusion for consumers whether the change in title means a change in scope of services provided by podiatric surgeons as well. Medium to long term: More clarity on the specialty as consumers are less likely to associate 'surgical podiatrist' as someone who is medically trained compared to title with word 'surgeon' included.
4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?
As podiatric surgeons mostly work in private practice, changes to title have to be made to advertising materials adding to potential costs. This change would not affect many professionals, given that according to the Australian Health Practitioner Regulation Agency, there were 42 podiatric surgeons registered in Australia in June 2024. Potential impact to the prestige of the specialty with the removal of word 'surgeon'. This could affect the consumer's preference to seek health care from an orthopaedic surgeon instead of a 'surgical podiatrist' for conditions that are within the scope of both professions. This could result in loss of revenue for podiatric surgeons and greater cost to Australia's public and health system. Any consequential impacts for insurance, health insurers, and podiatrists will also need to be considered.
5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?
Nil.

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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?

We do not support the proposal to change the protected title from 'podiatric surgeon' to 'surgical podiatrist.'

The title 'podiatric surgeon' accurately delineates the practitioner's specialty and scope of practice, aligning with established titles like general surgeon, oral surgeon, and orthopaedic surgeon. The wording of the title is clear; the specialty is indicated in first word and the term 'surgeon' clarifies the practitioner's surgical role. The use of the term 'surgeon' is reflective of the advanced training, qualifications, and scope of practice associated with this specialty. Changing the title to surgical podiatrist, or an alternative of this, creates more confusion as it is not consistent with any other surgical titles.

The Independent Review of the Regulation of Podiatric Surgeons in Australia (the Review) stated that any changes to titles should be justified with strong evidence that less directive measures cannot achieve the desired reduction in consumer confusion or potential harm. We believe that implementing recommendations 6 and 7 concerning advertising should be prioritised to address public misunderstanding rather than altering the protected title.

Additionally, 'podiatric surgeon' and 'oral surgeon' are already recognised specialist titles under the National Law for qualified podiatrists and dentists, respectively. Changing this title would require an amendment to National Law, which is unnecessary given that public misunderstanding could be effectively mitigated through existing recommendations.

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.

We recommend AHPRA consider recommendation 4 after other recommendations have been implemented for a suitable duration to test the efficacy prior to a permanent change of the National Law.

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

Changing the title from 'podiatric surgeon' to 'surgical podiatrist' could lead to increased confusion for consumers. Podiatric surgeons undergo extensive surgical training to perform complex procedures on the foot and ankle. The title 'podiatric surgeon' clearly communicates the qualifications and scope of practice, aligning with the public's understanding of surgical professionals. In contrast, the term 'surgical podiatrist' could be misleading, as it may also apply to podiatrists with general registration who can perform minor surgeries like nail avulsions.

This confusion could result in patients mistakenly consulting a surgical podiatrist expecting conservative treatment, only to be surprised with surgical options. Such scenarios could cause distress to the consumer and potentially lead to further complaints to regulatory bodies. Additionally, the ambiguity of the term could lead to a misuse of podiatric surgeons' expertise as consumers are unaware of their scope of practice. For example, patients needing conservative care could

unknowingly engage the services of a podiatric surgeon instead of a generally registered podiatrist. This means the podiatric surgeon is spending more time providing conservative care, causing their surgical waitlist to grow. Alternatively, consumers might engage orthopaedic surgeons who may not be a specialist in foot and ankle surgery, putting further strain on orthopaedic waitlists and adding an extra medical appointment as they require a referral from a general practitioner (GP) who are in shortage. This confusion delays access to care, increasing the period of time consumers are experiencing pain and disability, instead of seeing the right health professional in the first instance.

We believe that following recommendations 6 and 7 for advertising, as agreed to by the Australian College of Podiatric Surgeons (ACPS), would be more effective in reducing public misunderstanding and the impacts on consumers without altering the protected title.

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

Changing the title from 'podiatric surgeon' to 'surgical podiatrist' could have significant personal, professional, reputational, and financial impacts.

Personal and Professional Impact: Podiatric surgeons invest substantial time, effort, and financial resources in order to complete the extensive surgical training. Changing their title would undermine and devalue the personal sacrifices and the commitment they have shown to advance the podiatry profession. Changing the title could affect their ability to practice within the public system in the future, particularly regarding access to Medicare Benefits Schedule (MBS).

Reputational Impact: The proposed change of title carries implications for the professional status of podiatric surgeons. The shift in title could imply a demotion in their standing, which may diminish trust in podiatric surgeons among consumers and referrers. It can increase wait times for orthopaedic surgeons for procedures that podiatric surgeons are fully qualified to perform, increasing the financial strain on public hospitals and government resources.

The current title 'podiatric surgeon,' aligns with international standards. Deviating from it could create inconsistencies with global practices, damaging the reputation of podiatric surgeons in Australia.

Financial Impact: A title change would necessitate a rebranding of the Australian College of Podiatric Surgeons (ACPS), along with updates to textbooks and literature. Practicing podiatric surgeons would incur costs related to revising business materials, advertising, and signage to reflect the new title. This loss of confidence as mentioned above will cause a decline in consumers engaging podiatric surgeons, decreasing their income which may not balance out the higher registration fees and CPD requirements still required to practice in a surgical setting.

Podiatric surgeons should not face these consequences for responsibilities shared by other stakeholders. Referrers need to educate patients about the qualifications of podiatric surgeons. Governing bodies such as the Podiatry Board (of Australia) and AHPRA should have proactively informed consumers about the meaning of the title prior to the Review, and in line with Recommendation 5 and their role to advocate for the profession.

The Review states that the notifications relating to repeat offenders "significantly inflate the results." Analysis of complaint data and processes to manage these 'repeat offenders' would be more appropriate action to improve the safety and quality of services.

Overall, the potential impacts for podiatric surgeons are substantial, and implementing other recommendations from the Review would be a more effective approach to address public understanding rather than changing National Law and the title of podiatric surgeons.

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

Changing the title from 'podiatric surgeon' to 'surgical podiatrist' could result in several unintended consequences that may not have been fully considered by the Board:

Professional Consequences: The proposed title change could diminish the appeal of pursuing a career in podiatric surgery, which is currently a unique pathway within allied health. The opportunity to become a podiatric surgeon offers a distinctive career advancement that no other allied health profession currently provides. Changing this title could impact the attractiveness of the specialty, leading to a decline in interest and enrolments not only in podiatric surgery, but for the broader podiatry profession.

This would be detrimental as the podiatry field is already experiencing challenges in workforce attraction and retention, as evidenced by the ongoing national shortage of podiatrists over the past four years (National Occupational Shortage List). The growth rate for registered podiatrists has declined drastically from 2013 to 2023, and university enrolments for podiatry have decreased significantly since 2015 (2024 Podiatry Workforce Snapshot). The Review states *"With an ageing population and long wait times for orthopaedic surgery in the public system, there will likely be steady growth in consumers seeking advice and treatment for foot and ankle problems. However, without support for the work of podiatric surgeons from the Australian Government and state and territory governments, there is a risk that the profession will remain small and fragile"*. The podiatry profession needs support now more than ever and changing the title of podiatric surgeons is not supporting the profession.

Podiatric surgery is a primary example of how allied health professionals can work to their full scope of practice. This broad scope of practice attracts people to the podiatry profession and retains podiatrists who want to undertake a change or increase their clinical skills within podiatry. Accepting recommendation 4 may cause reputational damage to the podiatry profession and result in an overly cautious approach to other allied health professions considering an increase to their scope of practice, anticipating a similar outcome. A change of title implies that allied health working to full and advanced scope of practice may not be supported by the health system as a useful and necessary adjunct to medical professions with similar or overlapping scopes of practice and comparable rates of notifications by consumers.

Reputational Damage to the Board and AHPRA: Implementing this title change could create a perception of bias towards orthopaedic surgeons. Historically, orthopaedic surgeons have opposed the use of the title 'surgeon' in podiatry due to concerns over training standards. The report shows that most practitioner submissions came from orthopaedic surgeons, and some of these submissions advocated for removing the protected title for podiatric surgeons. Complying with the title change may be viewed as prioritising the interests of the medical profession at the expense of allied health, impacting trust in governing bodies who support and advocate for allied health professions. The influence the medical profession has is supported by the following research article published in the Journal of Foot and Ankle Research *"Contested role boundaries and professional title: Implications of the independent review of podiatric surgery in Australia"* (2024).

Overall, while the proposed title change aims to address public clarity, it could inadvertently undermine the podiatry profession and its reputation, reduce career pathway opportunities, and risk devaluing allied health professions. The other 13 recommendations in the Review offer a comprehensive approach to protecting the public without causing harm to the podiatry profession.

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We agree that the current protected title for the podiatry specialty of 'podiatric surgeon' may be a point of confusion for consumers (although we have not observed much direct evidence of this). A replacement term such as 'surgical podiatrist' may be a less confusing term as it conveys the type of health professional (a podiatrist) and delineates it from the other roles that a surgeon has (e.g., prescribing, etc.).

It is important to note that the term 'podiatric surgeon' is used across multiple pieces of collateral and content within the Australian Private Health Insurance industry, including the podiatry billing schedules which are also used by electronic claiming systems. Any change to this term will require changes to that collateral and content, with a consequent administrative and cost burden. Given the associated costs, we support change on the basis that the benefit to consumers from a name change is greater than the associated effort to manage the change.

If this proposal were to proceed, consideration should be given to the transition period provided to private health insurers to implement this change across their collateral and content.

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. See also response to Q1 above.

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

See response to Q1 above.

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

Nil response.

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

See response to Q1 above.