

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.

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

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

Myself

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Question B

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

A registered health practitioner?

Profession: Orthodontist – past ADA council member

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.

- a) Podiatric Surgeon is an internationally recognised and protected title. As an AHPRA registered paramedical specialist for 30 years it is important to be part of an international specialist community. Our training and continuing education is on an international level. This is important to keep pace with constant advances in our speciality fields and maintain the highest quality care for our patients. As a small specialty, the international ties are even more important.
- b) The term 'surgical podiatrist' has not been used for 40 years. Following the history of use of this title shows it was used before a structured post graduate course was the requirement for registration. To return to an old title appears outmoded and downplays the significant amount of additional training now required to specialize. To become a registered AHPRA specialist is a long and expensive proposition. We forego other things in our lives for our dedication to our profession.
- c) As an Orthodontist I am a specialist and operate a restricted practice. Dentists can do orthodontics but cannot call themselves orthodontists. To use the term 'surgical podiatrist' when under the qualification of a podiatrist allows certain surgeries (i.e. use of a scalpel) I believe makes this more confusing for the public. As the scope of practice for a podiatric surgeon far exceeds those of a podiatrist doing surgery.
- d) This change in title appears to have started following the issues with cosmetic surgeons. I feel it is important to note that 'cosmetic surgeon' was not a recognised medical speciality. There was no further training or registration requirements to use this title.
- e) The term dental surgeon is synonymous with dentist. The term surgeon is used in the paramedical field and is recognised as not being sole for the use of those with medical qualifications.

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 have an alternative suggestion. But I wonder if Britain and the USA, who have higher numbers of Podiatric Surgeons, have found ways to provide clarity to consumers.

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

I think consumers will be more confused. They will not understand the significant training and the knowledge base these specialists have.

With specialist waiting lists significant, will the demand for podiatric surgical procedures be able to be met if these changes confuse the public on where those procedures can be provided.

To meet the possible implications of these changes, would podiatrists still seek to become specialists? And if not, would the training costs associated with only orthopaedic surgeons doing procedures add to government costs for their training and increase costs to the patient?

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

If I had to change my title, there would be significant costs. Signage, letterhead, business cards, referral pads, website, etc. I am unsure of the legal ramifications if this affected the business or insurance of a practitioner. If this affected the productivity of the specialist, would it then allow them to seek damages. When we begin our specialty training and careers, we invest time and money. As a specialist I have never contemplated that my AHPRA registered and recognised title could be changed. AHPRA is respected and we all work towards maintaining AHPRA standards. If AHPRA can change a title in one speciality I would be concerned for mine and all the others.

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

A lot of smaller specialties in Australia rely on the international community. We do not want to isolate or separate ourselves from this. Our specialists are as highly qualified as those overseas. Our specialist qualifications are recognised internationally even in instances where our undergraduate degrees may not be.

I believe Australia has a great drive towards education. To discredit ourselves on an international platform, even if it is a small one, would be detrimental. We want to maintain our high standards and be able to have highly trained international specialists to seek out Australia for continuing education or careers.

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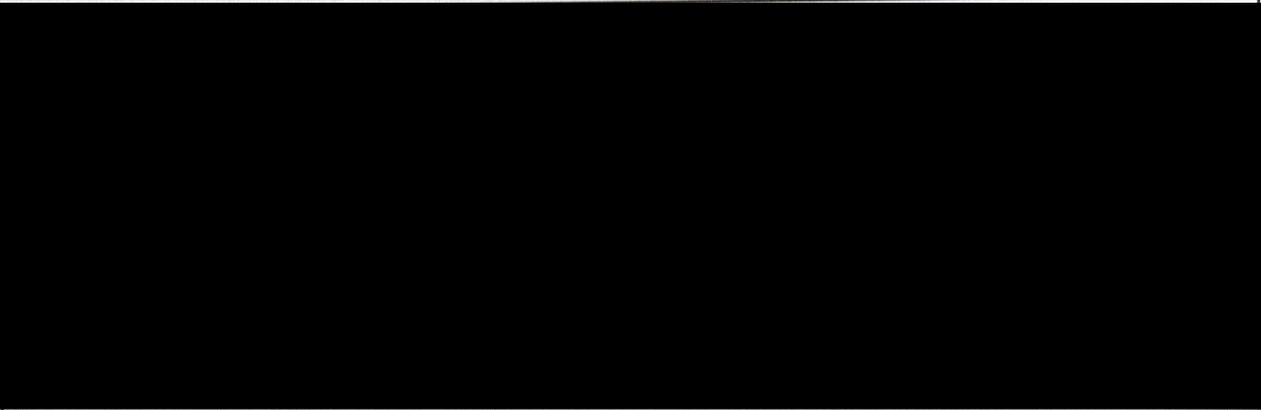
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Question B

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

A registered health practitioner?

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

Podiatrist. Registered nurse

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

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?

Under value
podiatric surgeon. ~~podiatrist~~ ~~podiatrist~~

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

Reduced quality of patient care

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

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Myself

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Profession: Podiatrist

A member of the public?

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Your responses to the consultation questions

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Do not agree

The current title is a professional title that clearly indicates to members of the public that the practitioner is a podiatrist who has surgical skills. No different to Dental surgeons.

It is a protected legal title used in many counties of the world and a change in title should never have been proposed let alone be put up for consultation in any format

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

DO not change the current title

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

Consumers are aware of what the word "surgeon" implies or means. The word surgical as an adjective before the registered name of a profession is not applied to any other medical profession and is likely to cause confusion

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

It diminishes the professional abilities of the registered practitioners in question and will impact their income as private health insurance companies may reduce or completely cut funding for podiatric surgery

Potentially increased cost in professional indemnity as a result of creating a false impression of podiatric surgeons not being as capable of providing safe surgery

Increased advertising costs

Increased cost in stationary

The profession being made redundant due reduced patient numbers and fewer podiatrists wanting to train in surgery

- 5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?**
- A. Potentially negatively impact access to funding for podiatric surgeons services through Medicare or private health insurance and thereby increase the cost of foot surgery to the health system.**
 - B. Increased cost to the public for private health insurance as those providers who pay for podiatric surgery will increase fees to cover a profession with “diminished” abilities. Some providers may completely cut off funding for podiatric surgery**
 - C. Increase wait times to access public hospital for foot surgery by diminishing the trust of the public in Podiatric Surgeons and podiatric surgeons having to charge more for services due to private health insurance podiatric surgery payment cuts**
 - D. Challenges to protected titles of other healthcare practitioners registered to provide surgery Dental Surgeons**
 - E. Fewer podiatrists wanting to train as podiatric surgeons and the profession becoming redundant**

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No I do not agree. I have sent many patients to podiatric surgeons over the years and not one patient has had any confusion of the origins of there professional training and background. They are all aware they were podiatrists originally whom then went on to an intensive podiatric surgical training program .

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' says it as it is and as it should be. Podiatric is the adjective to the noun podiatrist, and thus is perfectly clear in expressing whom they are. A podiatrist with surgical training. It has been this way for over 30 yrs, changing now will cause the confusion to the public and others. The word surgeon is by no means isolated to those whom have only a medical based degree, as dentists are often officially called dental surgeons and they also have there own specific dental degree and not a medical degree.

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

As discussed above you will cause confusion by changing the current title.

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

It will be significant costs to podiatric surgeons to re educate public, and the many other health providers, health insurance providers, government bodies and third party payers etc . It will have an impact on the public, hospitals , and other parties that interact in that ecosystem. Overall, consumers will bear the costs, and confusion, while the podiatric surgeons will suffer dealing with the repercussions of time and costs to make such changes and the effect on there practices.

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

It seems nonsensical to make this change after the name has been in place for so long (over 30 yrs) and some how this has not come up previously as been a common concern. It will actually cause confusion to the public and have also complications with the bodies discussed above.

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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 speciality 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. Changing the title undermines the level of training podiatric surgeons have obtained and it will have the potential to confuse the public on what an orthopaedic surgeon, surgical podiatrist and general podiatrist scope of practice is.

Even though a podiatric surgeon is not medically trained, expensive postgraduate training both in Australia and internationally enables these podiatrists to perform reconstructive foot and ankle surgery safely and effectively. This leads to an appropriate title of podiatric surgeon.

The specialised training provided by ACPS equips podiatric surgeons with the skills and competencies to perform reconstructive surgery of the foot and ankle. A general podiatrist also performs a level of surgery (Wart curettage, nail avulsion procedures) so in my opinion to avoid confusion podiatric surgeon is a fitting title. Whats the difference then between a "surgical podiatrist" and a general podiatrist who can also potentially prescribe medicines and perform a level of surgery?

In clinical practice, it is our duty of care as practitioners to give the patient options when looking to consider foot and ankle surgery and give them a choice.

Can we just keep explaining the differences between podiatric and orthopaedic surgery to provide clarity like below without changing any titles?

1. A orthopaedic surgeon which specialises in the foot and ankle have completed a medical degree at university, and upon graduation they complete a minimum of 3 years of postgraduate work in clinical settings and then enter an orthopaedic training position and if successful graduate as an orthopaedic surgeon. They have a level of Medicare funding, and more readily recognised by private health fund. They practice in public and private hospitals.
2. A podiatric surgeon has not completed a medical degree. They have completed a podiatry degree specialising in non-surgical management of foot pathology, as well as nail and wart curettage surgical procedures. They then go on to complete a masters degree, and a 6-8 year surgical training traineeship with the Australasian College of Podiatric Surgeons. They do not have medical funding for their services, and only have a small list of private health funds who provide cover. This includes out of pocket costs for the anaesthetist.

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?

Keep the title the title the same (podiatric surgeon).

We need to look at further education at university level for podiatry students on how to effectively explain the differences of referral pathways for foot surgery to patients.

Further education provided to medical practitioners and allied health practitioners on the training and qualifications podiatric surgeons obtain, and in the meantime further education on the scope of practice of general podiatrists.

The Australian Podiatry Association supporting and lobbying for ALL podiatrists, including podiatric surgeons on the value these practitioners have, not only podiatrists but to the community and the health of Australia.

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

The consumer will have less confidence in seeing a podiatric surgeon creating a stigma that they are not surgeons and can not perform foot and ankle reconstructive surgery safely and effectively. This will increase the demand on orthopaedic surgery where the demand for foot surgery is growing in Australia generally. There is already lengthy waits to see orthopaedic surgeons and if they do not have the confidence to see a “surgical podiatrist” then Australians will not get the services they need in a timely manner.

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

1. Mental health burdens on podiatric surgeons by stripping podiatric surgeons of their title they have worked so hard for, and dedicated a substantial proportion of their life to obtaining. Some have sacrificed so much time with family and friends to be able to obtain a profile/title they are proud of. Seeing one in five Australian adults experience mental illness every year, aren't we trying to reduce this?
2. By confusing the consumer on what a surgical podiatrist is and the procedures they perform, this could reduce the number of patients podiatric surgeons see which would have a financial burden on their lives.
3. Increased lobbying costs for the ACPS, which could result in less courses provided for general podiatrists which directly progress the podiatry profession and leads to better outcomes for patients.

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

1. Less patients seeing podiatric surgeons, increased demand on orthopaedic surgeons, longer wait times for patients to see a foot and ankle surgeon.
2. Disgruntled podiatrists who feel their profession is not progressing or being recognised for what it stands for.
3. An increase in hospitalisations relating to diabetes foot related complications if these patients are less likely to have the confidence in seeing a podiatric surgeon because of the title change. Less confidence in seeing a podiatric surgeon, less procedures such as hammertoe corrections and tenotomies being performed, increased risk of ulceration and hospital burden.
4. Less patients being referred to podiatric surgeons who have an extensive knowledge from podiatry on non-surgical management of the foot and ankle. This could equate to more patients have unnecessary foot and ankle surgical procedures.