

## 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](mailto:podiatryconsultation@ahpra.gov.au).

**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

Name: Rachel Vogel

Contact email: [REDACTED]

#### Question B

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

☒ A registered health practitioner?

Profession: Physiotherapist

☐ 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.

As someone who refers to podiatrists, orthopaedic surgeons, and podiatric surgeons, the title "podiatric surgeon" is appropriate and accurate.

In my personal opinion, "surgical podiatrist" is a more confusing term, and I feel that my patients would assume this to mean their small surgeries already given by and available from podiatrists as opposed to larger and riskier surgeries.

**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 believe that the title "podiatric surgeon" is understandable and appropriate.

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

I believe it would create GREATER ambiguity regarding what consulting with a podiatric surgeon would involve.

I think it undervalues the rigorous training these individuals undertake, and may cause some confusion, with patients believing that these individuals offer less specialty training than a surgeon and no more than a podiatrist.

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

Possible loss of income, with greater misunderstanding and ambiguity about the specialty training involved.

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

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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 email:

☒ Myself

Name: Carmelina Vozzo

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

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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. The title podiatric surgeon is protected for a reason, and that is because it is the best descriptor of what podiatric surgeons are and what they do.
- The term podiatric surgeon is an international term used in the United States and the United Kingdom.
- Anaesthetists (specialist medical practitioners) have worked for decades with podiatric surgeons and have never expressed concern over the title, podiatric surgeon. This is because they are witnessing surgery, by specialist podiatric practitioners.
- If confusion exists, then it is best addressed by a public information campaign and by the practitioner providing appropriate information to the patient.
- The public I've encountered - for whom the title is important to capture the scope of practice - has not expressed any concerns or confusion over the use of the title Podiatric Surgeon. This demonstrates that it is an accurate description and that a possible source of pressure to change the title stems from other surgeons.
- Podiatric surgeon is appropriate, as an AHPRA approved course in podiatric surgery is completed before the title can be used.
- The term podiatric, is indicative of podiatry, whilst 'surgical' is a demotion from being a true surgeon.
- A title change, of the type suggested, is akin to a psychologist being called a counsellor, or a police officer, being called a security guard, when their respective training and occupational responsibilities are far more comprehensive.
- No country in the world has what are termed surgical podiatrists.
- Frequent reviews and changes are made to the Australian college of podiatric surgery, all candidates expressing interest in following the fellowship pathway are required to currently hold or be undertaking the Endorsement of Scheduled Medicines.

### 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?

- International consistency in terminology is the one component of removing confusion, followed by consumer and stakeholder education.
- Orthopaedic Surgeon is a term used throughout the world. There are no Surgical Orthopaedists.
- A change of title is not likely to improve safety, knowledge, skills or bedside manner which should be the focus. The Independent Review reported that podiatric surgeons are safe and work well with other medical practitioners - including orthopaedic and vascular surgeons. Considering the good outcomes reported the independent review recommended that further integration of Podiatric Surgeons into the public health system (as it is in the UK).

Alternative descriptors could be:

Podiatric Surgeon (Podiatrist Practicing Podiatric Surgery)

Podiatric Surgeon (Specialist Podiatrist)

Doctor of Podiatric Medicine (DPM) (Foot and Ankle Surgeon)\*

The alternatives suggested would be accompanied by a consumer and stakeholder information campaign to supplement understanding and remove confusion.

\*This is an appropriate title as Doctors of Podiatric Medicine (DPM) training programs are running, with more being established in Australia. American podiatrists are called Doctors of Podiatric Medicine (DPM's).

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

- Consumers may be confused that surgical podiatrists are not sufficiently trained in foot and ankle surgery to the level they require and desire.
- The consumer will be at a disadvantage because a surgical podiatrist will never receive parity in funding, via Medicare and private health insurance companies, for their surgery. Their out-of-pocket expenses for surgery will therefore be higher.
- The consumer will be disadvantaged because specialist podiatrists will not have parity with medical specialists, such as orthopaedic surgeons, which prevents equality in interprofessional relationships, which is better for patient outcomes.
- Consumers will be at a disadvantage because a surgical podiatrist will not be able to advocate for them, on the same level as an orthopaedic surgeon, even should the orthopaedic surgeon have no specific training in the foot, ankle and lower limb.
- A surgical podiatrist will have less status in foot and ankle surgery compared to all other surgical specialist fields, even though these other fields/practitioners may perform little foot and ankle surgery. This means the consumer may undertake surgery with another surgeon, who does not have the same level of experience in foot and ankle surgery, as the surgical podiatrist.
- Less diversity in health care provision, is not in the best interests of consumers, who are entitled to choice in health care provision.

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

- The impact of title change will be devastating to the field of podiatric surgery, as it will stymie full integration of this specialist field into the Australian health care model.
- It will stimulate an increase in AHPRA notifications from orthopaedic surgeons against podiatric surgeons, because a surgical podiatrist will be perceived to be inferior to an orthopaedic surgeon, even an orthopaedic surgeon who has limited training in the foot and ankle.
- Medical dominance will stymie the progression of an entire profession field, that of podiatry/podiatric medicine in Australia, which is in contrast to the United Kingdom and the United States.
- Absence of an appropriate title will ensure podiatric surgeons continue to receive inadequate professional recognition, funding for services rendered and ongoing vulnerability to unfair litigation and scrutiny.

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

- Title change from podiatric surgeon to surgical podiatrist will remove a level of parity for the profession of podiatry, with medicine, whilst most individual medical doctors see the profession as collaborative and not subordinate.
- Title change creates more confusion for the consumer as it provides them with insecurity as to the level of training the practitioner has received, especially as there is no preface for the title anywhere in the word.
- Collaboration between orthopaedic surgeons and podiatric surgeons does happen around the world, based on the principles of mutual respect and on what is in the best interests of consumers/patients. This is the correct direction to take on this matter (change in title will likely impede this).
- There will be an unfair orthopaedic competitive advantage over podiatric surgeons – this is likely to have significant financial implications for podiatric surgeons.
- Title change demanded by the AOA is part of their plan to maintain a competitive advantage over podiatric surgery.
- The Australian Podiatry Board, which is independent from the Australian Medical Board, has its primary objective to ensure podiatric practitioners engage the public safely. Podiatric surgeons are safe and effective.
- Any confusion over title can be addressed by an appropriate media and information campaign. This is the less reactive and the best approach.



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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 Andrew Wood

Contact email: [REDACTED]

#### 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: Retired Dentist

#### 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?**

The protected title should not be changed because I understand what a podiatric surgeon is, and if I didn't, I could easily find out using a resource such as Google.

**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 support the use of any alternative title to podiatric surgeon because it risks undermining the credibility and current understanding of the title.

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

The change of the title will cause confusion to consumers because it fails to properly distinguish a podiatrist from a podiatric surgeon. Worse, still, AHPRA will be admitting to the public that their commonly understood grounds for registering Podiatric surgeons has been a misrepresentation to the public. The title of Podiatric Surgeon is internationally recognised, a change in Australia produces doubt regarding professional competence which affects the profession of Podiatric Surgery and the credibility of AHPRA.

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

Podiatric surgeons face significant costs to change their representation to the public, namely signage, business cards, stationery, websites, Google searches. Insurance and hospital rights may be lost if legal and bureaucratic issues arise.

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

Other health professions may have cause to doubt the durability of their professional status in the eyes of the public if their professional titles are subject to change under bureaucratic, political, legal or activist pressures. Professionals of the future may reconsider choosing a career if their status is not secured by a commitment to the existing professional title.

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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: Peter Wybenga

Contact email: [REDACTED]

#### Question B

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

☒ A registered health practitioner?

Profession: Remedial Massage Therapist

☐ A member of the public?

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

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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, as the title podiatric surgery seems to describe the type of surgery being performed. The title also will prevent podiatrist's who aren't surgeons from doing procedures that they are not qualified for. The title change could lead to public confusion as the public seek the surgeons who specialize in certain regions of the body example shoulder or hip. So it's beneficial to keep the title 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?**

No

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

It could lead to inferior podiatric surgery. The surgery for this region of the body is one of the most difficult orthopaedic surgeries that is done. As a Remedial Therapist for 25 years specialising in post-surgery rehab, it seems sensible to have a specialized surgeon for a complex region. Making Podiatric Surgeon (with the greatest specialization and training hours) a great title for public identification.

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

I have no idea about the consequences personally or professionally for the Surgeons.

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

The loss of a title that was achieved through outstanding academic achievements and paid for importantly.

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#### Your answer:

☐ Myself

Name: Mahmoud "Mike" Zeydan

Contact email: [REDACTED]

#### Question B

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

☐ A registered health practitioner? Yes

Profession: Podiatrist

#### Question C

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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 do not.

Over the past nine years I have referred an extensive amount of my patient s for surgical opinion and surgical intervention.

I personally have had nothing but success for the patients who have told me that there have been to many other orthopaedic surgeons and other specialists who have not been able to provide this level of care.

The amount of years spent training and the experience and expertise that has equated from this needs to be respected and appreciated. Changing the title is not only the meaning and also minimises the level of experience and expertise in the field.

### 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, I do not believe there is an alternative. Podiatric surgeons specialise in surgery over foot and ankle. Change the name to other than something that reflects this would not only mislead the public, but it would also impact the profession as a whole which would be detrimental to all patients within the communities who suffer from foot and ankle conditions.

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

I firmly believe if the title is changed that it will impact the way the public views podiatry surgeons. As a health professional myself, I believe all health professionals have a duty of care to provide best practise and do no harm. Changing the title impact the police perception of podiatry surgeons. Mina, they may be hesitant to seek surgical opinion and advice from podiatry surgeons, which means they will miss out on the best level of care.

I firmly believe if the profession is impacted that can have a negative outcome on members of the public who suffer from chronic foot and ankle pain and conditions.

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

Podiatric surgeons are reccredited and recognised by AHPRA. A profession has been clinically proven to provide benefit to the public and treating chronic complex potential conditions and also has been proven to be safe and effective in providing surgery of the foot and ankle. Changing the title may make the public hesitant and not want to seek the professional opinion of podiatry surgeons. This will not only affect individualised businesses but also the profession as a whole. I firmly believe that if this profession is

impacted that the public will no longer have access to the best level of care and expertise that I provided my podiatry surgeons. It is within the best interest of the public for the title to remain as it is so that they can respect the profession and recognise the extensive training that podiatry surgeons have done.

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

Absolutely there is.

A title change will create an unfair competitive advantage for the orthopaedic surgeons, as podiatric surgeons will be perceived as podiatrists with advanced training, rather than fully accredited surgeons who have complete exhaustive training in specialised foot and ankle surgery.

It is important to emphasize that use of the title Podiatric Surgeon is entirely consistent with the title Orthopaedic Surgeon; that is podiatric surgeons have undertaken the extensive and exhaustive training required to perform foot, ankle and lower limb surgery, just as orthopaedic surgeons have completed the training regime necessary to perform orthopaedic surgery. The member of each profession is a surgeon, conducting surgery within their fields.