



Response template for submissions to the *Independent review of the regulation of podiatric surgeons*

You are invited to have your say about the regulation of podiatric surgeons by making a submission to this independent review. The consultation questions from the consultation paper are outlined below.

Submissions can address some or all of these questions, and you can include any evidence or examples that you think are relevant.

You can email your submission electronically to:

Professor Ron Paterson
Independent reviewer
podiatricsurgeryreview@ahpra.gov.au

If you are unable to provide your submission via email, please send your written submission to:

Professor Ron Paterson
Independent Reviewer
Independent review of the regulation of podiatric surgery
c/o Ahpra
GPO Box 9958
Melbourne VIC 3001

The closing date for submissions is 5.00pm AEDT 16 November 2023

Publication of submissions

At the end of the consultation period, submissions (other than those made in confidence) will be published on the Ahpra website to encourage discussion and inform the community and stakeholders about consultation responses.

The review will accept 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 These submissions will not be published on the website or elsewhere.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.**

We will not place on the 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 may remove 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 review.

Published submissions will include the names of the individuals and/or the organisations that made the submission, unless confidentiality is requested. If you do not wish for your name and/or organisation's name to be published, please use the words '**Confidential submission**' in the subject title when emailing your submission.

Initial questions

To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.

Question A

Are you completing this submission on behalf of an organisation or as an individual?

Your answer:

☒ Organization

Name of organization: Department of Orthopaedics and Trauma SALHN

Contact email: [REDACTED]

☐ 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

☐ No – **do not** publish my submission

Your responses to the consultation questions

1. Do you think the way podiatric surgeons are currently regulated in Australia ensures consumers are well informed and receive appropriate care from podiatric surgeons who are suitably trained and qualified to practise in a safe, competent and ethical manner?
<p>No. It is clear that the majority of general public patient's are not aware that podiatric surgeons not medically trained and that their training does not correspond to the level required for an orthopaedic surgeon who is undertaking foot surgery. The fact that this review is being considered necessary by AHPRA indicates that the podiatry board's has concerns. There are considerable concerns about the appropriateness and Independence of the regulatory authority for podiatric surgeons.</p>
2. Do you have any suggestions to improve the current system for regulating podiatric surgeons?
<p>It is important that the current system of regulating podiatric surgeons be upgraded so that the training itself is assessed independently at least to a level of a medical practitioner.</p> <p>I note that this is requirement for dentists wishing to practise oral surgery and podiatric surgery should be held to at least this level of training.</p> <p>Given the number of complaints against podiatric surgeons it is important that any regulatory body be independent. It would not be appropriate for the current tranche podiatric surgeons to be grandfathered to allow them to continue operating given the very high rate of complaints</p> <p>There is a considerable danger of "regulatory hijack" unless an independent agency such as the AMC is involved in the regulatory process</p>

Registration

3. Do you have any concerns about the registration requirements for podiatric surgeons? Are any changes needed, and why?
<p>The current training programs for podiatric surgeons have never met the standards required for accreditation by the AMC in Australia or internationally (in particular the USA) and as such should not be endorsed by AHPRA until they do.</p> <p>No Australian podiatrist can be registered to work or train in the United States without further study equivalent to almost the entire undergraduate program, a 3-to-5-year full time undertaking.</p>

Performing surgery on members of the community is a privilege which deserves the best and highest level of training. It is the lack of this level of training, and the appropriateness of the ongoing assessment of their results that I find disturbing and indeed appears to be of considerable concern to the Podiatric board of Australia and AHPRA.

Standards, codes and guidelines

4. Do the Podiatry Board's current standards, codes and guidelines adequately help ensure podiatric surgeons perform podiatric surgery safely?

No. Current standards codes and guidelines do not correspond to best practice foot and ankle surgery performed by trained medical practitioner's.

A more appropriate level of standards codes and guidelines to best practice would be at of the Royal Australasian College of surgeons or the American Council of podiatric medicine

5. Do the current professional capabilities for podiatric surgeons appropriately describe the knowledge and skills and knowledge required of podiatric surgeons for safe practice?

It is evident that the current professional capabilities for podiatric surgeons are not at the level to ensure safe practice.

6. Are any changes to the standards, codes and guidelines needed? If so, why? What additional areas should the standards, codes and guidelines address to ensure safe practice?

changes to standards codes and guidelines should be at least equivalent of those required for the College of surgeons or American equivalent

Important to note that the American podiatric surgical training program a far more extensive and prolonged and more closely approaches that of American medical practitioner's

Education, training and qualifications

7. Do you have any concerns about education and training for podiatric surgeons? Are any changes needed, and why?

Training for podiatric surgery should mirror that of dentists wishing to perform oral surgery. Includes an appropriate primary degree training to AMC level, and surgical training under formal supervision full time. I would suggest approaching the dental Association and the Royal Australasian College of surgeons for the appropriate syllabus training requirements which could be used as an example to raise the level of training for podiatric surgeons.

Management of notifications

8. Do you have any concerns about the approach used by Ahpra and the Podiatry Board to manage notifications about podiatric surgeons, including the risk assessment process?

The audit of podiatric surgeons and trainees is deficient in that it records the number of procedures undertaken rather than the number of operations performed, for example operating on four toes is one operation but each toe has a separate procedure undertaken, thus inflating audit numbers. Also, the publicly available audit data includes toe nail procedures which can be undertaken by general podiatrists. Any audit should only include operations (not procedures) that can only be undertaken by podiatric surgeons.

Since Podiatric surgery and training is undertaken in the private system either in small day surgery centres or under local anaesthetic in the podiatrist's rooms it leaves little scope for oversight or audit. Many small day surgery centres may lack Medical Advisory Committees (MAC), audit or morbidity and mortality reviews required by Specialist Surgeons as part of their CPD and commercial pressures can come into play when assessing performance

Advertising restrictions

9. Do you have any concerns about advertising by podiatric surgeons and the management of advertising offences?
Aware that some but by no means all podiatric surgeons indulged in unacceptable advertising practices and it is important that AHPRA continue to monitor and manage these problems

Further comments or suggestions

10. Do you have any further comments or suggestions relevant to Ahpra's and the Podiatry Board's regulation of podiatric surgeons?
In summary if the podiatry board feels that there is a specific need for podiatric surgery then it is important that training considerations for the safety of the population be considered Paramount. Any such training should be full time and of appropriate length and patient volume exposure and be fully audited. This is the case with other surgical subspecialties such as oral surgery which would appear to be the most appropriate comparison.