

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

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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Initial questions

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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

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

☒ 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. I strongly believe that changing the name to surgical podiatrist will just cause further confusion to the public and will be a detriment to both podiatric surgeons and general podiatrists. This is because general podiatrists do perform some minor surgical procedures – such as ingrown toe nail removal. Changing the title to surgical podiatrist makes it seem like a general podiatrist should not be performing any surgical procedures no matter how minor.

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?

You could propose a title of Specialist Foot Surgeon – in this way it is identifying that Podiatric surgeons would be operating on the foot only (unless specifically trained to operate on the ankle as well) and Orthopaedics could be Foot & Ankle Orthopaedic Surgeon. But mostly I believe the title should not be changed.

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

I believe it will be more confusing for consumers. Consumers may start to wonder why their general podiatrist is recommending toe nail surgery when they are not surgical podiatrists. I think this will lead to greater issues for the Podiatry profession overall.

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

A title change will have a great impact on Podiatric surgeons – they will have to completely change all of their advertising, their clinic brands/clinic names, business cards etc. More importantly it will likely negatively impact their wellbeing and mental health. It may bring up difficult questions, they may lose clients and overall I strongly believe it doesn't make anything clearer for the public.

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

Has the board considered that the general public probably expects most doctors to be well versed on the anatomy of the foot, when I have heard from several of my colleagues that have gone through medical school they do not learn about the anatomy of the foot in any great detail. Their anatomy classes focus on everything up to the ankle and when asked why not the foot the answer is "refer to a podiatrist". I would hope that an orthopaedic surgeon who wishes to specialise in the foot and ankle receives a little more training in both the structures and the function of the foot before they commence operating, but I am not so sure that the latter makes a huge part of their education.

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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

████████████████████

██

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

☒ 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. The title of surgeon needs to be protected to only include practitioners who have undertaken study accredited by the Australian Medical Council.

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 proceduralist, or procedural podiatrist. Simply put, a podiatrist who can undertake a limited scope of procedures.

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

Clear distinction and consistency between practitioners who have achieved surgical accreditation through the AMC, just like every other surgical practitioner, and those who have independently assessed their own competencies without federal oversight.

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

They'll likely lose prestige and income, however this change needs to be impetus for working with the rest of the Australian medical community to reintroduce podiatry procedures and those with expert podiatry skills into the same protection, governance and prestige as all AMC accredited surgeons.

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

It may result in a number of podiatric surgeons quitting their role, however given there's only 22 in Australia, it may provide the impetus to rejoin the rest of the medical community.

To: [REDACTED]
Subject: Podiatryconsultation
Date: Fwd: The title 'podiatric surgeon'
Thursday, 24 October 2024 4:57:27 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

podiatryconsultation@ahpra.gov.au

Hi,

Please see my submission below.

[REDACTED]

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Your answer:

Myself

[REDACTED]

[REDACTED]

Question B

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

☐ A registered health practitioner?

Yes - Anaesthetist Accredited by JCCA - ANZCA / RACGP / ACRRM

Question C

Would you like your submission to be published? Yes, publish my submission **without** my name/ organisation name

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?

Confusion.

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

Threatens the ability of Podiatric Surgeons continue to perform the Speciality in which they are trained.

Threatens the Podiatric Surgeons livelihood.

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

Highly likely, always many negative impacts borne anre out of confusion, many of which are not easily predictable before the change.

Confusion is a strong place to commence negativite impacts.

I believe before any change to the English Language is contemplated, consultation with English Language Academics at University would be be the first step.

Health providers should stick to what we are trained in.

Trying to change the English Language should be only contemplated by those highly trained in this area eg English Language Academics at University

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Question B

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Profession: Podiatrist

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☐ 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?

I absolutely 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.

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.

We have a specific surgical pathway that has been painstakingly mapped out. Our Podiatric Surgeons have paved the path for us to achieve Endorsement for Scheduled Medicines, and the use of Ultrasound imaging in practice.

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.

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.

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?

Instead of changing the title, can we not better educate people as to the differences between a Podiatric Surgeon and an Orthopaedic Surgeon? See below:

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.

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

I feel that changing the title will leave consumers confused and with less confidence in Podiatric surgeons, even though these surgeons are the absolute experts in the foot and ankle.

There is also the added risk of patients having access to timely care, as the wait lists for orthopaedic surgeons grows.
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4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?
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1. By stripping podiatric surgeons of their title – a title that they have worked so hard for - are we not minimising their contribution to our profession? This may have huge impacts on the mental health and wellbeing of our podiatric surgeons who have 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. Currently, one in five Australian adults experience mental illness every year. Is it not our duty to do everything we can to assist in reducing this??
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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.
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5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?
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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.

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I do not agree with the proposed change, because I think the existing title 'Podiatric Surgeon' is much clearer in communicating what podiatric surgeons do, and how they feature into the landscape of health practitioners. The title 'Podiatric Surgeon' follows the same conventions as other medical practitioners/surgeons, and through this convention conveys meaning. In the same way that 'neurosurgeons' are surgeons who operate on the brain, spine, etc, and 'orthopaedic surgeons' are surgeons who operate on joins/bones/etc, the title 'Podiatric surgeon' conveys that they are surgeons who operate on feet and toes.

The title 'surgical podiatrist'—while very similar—risks needlessly complicating this understanding, as while it implies a similar idea, the difference in terms between 'surgical podiatrist' and other similar titles implies a needless difference in status or role, and risks subtly undermining the perceived knowledge, skill, or training of a 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?

I think the current title of 'Podiatric Surgeon' works very well.

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

I think changing to 'Surgical Podiatrist' would risk lowering the trust that many consumers have in the profession/practice. The change emphasises a sense of difference between Podiatric Surgeons and other surgeons, which in turn risks undermining the training, skills, and knowledge of Podiatric Surgeons.

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

Like the above, the change in titles risks eroding the perceived trust and knowledge of Podiatric Surgeons, who have undertaken many years' worth of training, learning, and specialisation to earn the title.

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