

## Public consultation

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May 2022

### Draft revised registration standard for specialist registration

#### Summary

The Podiatry Board of Australia (the Board) is consulting on a draft **revised** registration standard for specialist registration.

The current specialist registration standard and draft revised specialist registration standard set out the requirements for specialist registration for the podiatry specialty of podiatric surgery.

#### Making a submission

The Board is inviting comments on a draft revised *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery*. There are also specific questions which you may wish to address in your response.

Please use the response template to respond to the questions. You can submit your responses to the questions by email to: [podiatryconsultation@ahpra.gov.au](mailto:podiatryconsultation@ahpra.gov.au) using the subject line *Feedback on draft revised registration standard for specialist registration* by **COB 15 July 2022**. Submissions for publication on the Board's website should be sent in Word format or equivalent<sup>1</sup>.

#### Publication of submissions

The Board publishes submissions at its discretion. The Board generally publishes submissions on its website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our 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 will remove personally 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 Board.

The Board accepts 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 These submissions will not be published on the website or elsewhere.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.

**Published submissions will include the names of the individuals and/or the organisations that made them, unless confidentiality is requested.**

#### Next steps

After public consultation closes, the Board will consider all feedback from this consultation before finalising a proposed revised registration standard for submission to Ministerial Council for approval.

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<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you supply a text or word file. As part of an effort to meet international website accessibility guidelines, Ahpra and National Boards are striving to publish documents in accessible formats (such as word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

## Background

The Board has approval from the Ministerial Council for specialist registration for the podiatry specialty of podiatric surgery.

Under section 38 of the National Law<sup>2</sup> the National Boards may develop and recommend registration standards to the Ministerial Council for approval. The National Law requires National Boards to ensure there is wide-ranging consultation on the content of any proposed registration standard, code or guideline.

The Board's current registration standard for specialist registration came into effect on 24 February 2015. The current standard is due for review and in keeping with good regulatory practice the Board is reviewing the standard and has developed a draft revised standard for consultation.

## Proposed changes

The Board is not proposing any substantive changes to the current requirements for specialist registration and is not proposing any additional requirements. The proposed changes are:

- primarily editorial in nature, including rewording and restructuring to improve readability, and
- clarifying the requirement to complete a minimum of two years' full-time (or equivalent) general podiatry practice in a clinical setting.

### **Clarifying requirement to complete a minimum of two years' full-time (or equivalent) general podiatry practice in a clinical setting**

The only requirement that the current registration standard imposes in addition to the requirements for specialist registration set out in the National Law is the completion of at least two years of full-time (or equivalent) general podiatry practice in a clinical setting. This is defined in the current standard as a minimum of 35 hours per week; and practice in a clinical setting means that at least 80 per cent of work as a registered podiatrist involves direct clinical care and management of podiatric pathology.

This requirement is to ensure that practitioners have a period of maturation and exposure to general podiatry practice to consolidate their broad podiatry knowledge and clinical skills before commencing study in the specialised practice of podiatric surgery.

This requirement has not changed in the draft revised registration standard. However, the draft revised registration standard makes it clearer that the two years of full-time (or equivalent) general podiatry practice must be completed before starting a program of study that leads to a qualification for specialist registration as a podiatric surgeon.

## Options

The Board has considered the following options in developing this proposal.

### **Option 1 – Maintain the status quo**

Option 1 is to continue with the existing registration standard.

The current registration standard established the Board's requirements for specialist registration under the National Law. The Board has identified ways to improve the standard, including rewording and restructuring to improve readability, and clarifying some of the requirements such as the requirement to complete a minimum of two years' full-time (or equivalent) general podiatry practice in a clinical setting.

### **Option 2 – Proposed revised registration standard**

Option 2 is to consult on proposed minor changes to the current registration standard. Under this option the revised registration standard would continue to set out the Board's requirements for

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<sup>2</sup> Health Practitioner Regulation National Law, as in force in each state and territory

specialist registration. The revisions are mainly editorial in nature (restructuring and re-wording) to improve readability and clarifying current requirements where needed.

### **Preferred option**

The Board prefers Option 2.

### **Issues for consultation**

#### **Potential benefits and costs of the proposal**

The benefits of the preferred option are that the draft revised standard:

1. continues to protect the public by ensuring that only practitioners who are suitably trained and qualified to practise podiatric surgery in a competent and ethical manner are granted specialist registration
2. clearly sets out the requirements for specialist registration
3. has been reworded and restructured to improve readability and clarify some of the existing requirements for specialist registration.

The Board's preferred option does not propose any substantive changes to the current requirements for specialist registration and does not propose any additional requirements. Therefore, the costs of the preferred option are likely to be minimal and confined to practitioners and other stakeholders becoming familiar with the revised standard.

#### **Estimated impacts of the draft revised standard**

The Board does not propose any substantive changes to the current requirements for specialist registration, although more significant changes may emerge through consultation. The Board does not anticipate any impact on practitioners, patients and consumers including Aboriginal and Torres Strait Islander Peoples and other stakeholders arising from the proposed changes.

### **Relevant sections of the National Law**

The relevant sections of the National Law are sections 38, 40, 41 and 57.

### **Questions for consideration**

The Board is inviting general comments on the draft revised standard as well as feedback on the following questions.

1. Is the content, language and structure of the draft revised registration standard clear, relevant and workable? Why or why not?
2. Is there any content that needs to be changed, added or removed in the draft revised registration standard? If so, please provide details.
3. Would the draft revised registration standard result in any adverse cost implications for practitioners, patients or other stakeholders? If yes, please describe.
4. Would the draft revised registration standard result in any potential negative or unintended impacts for patients and consumers, particularly vulnerable members of the community? If so, please describe them.
5. Would the draft revised registration standard result in any potential negative or unintended impacts for Aboriginal and Torres Strait Islander Peoples? If so, please describe them.
6. Do you have any other comments on the draft revised registration standard?

## Attachments

Attachment A: Draft revised *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery*

Attachment B: The Board's statement of assessment against Ahpra's *Procedures for the development of registration standards, codes and guidelines*

Attachment C: The Board's Patient and Consumer Health and Safety Impact Statement

The current *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery* is published on the Board's website at <https://www.podiatryboard.gov.au/Registration-Standards.aspx>.