

# Podiatry Board of Australia's statement of assessment against *Ahpra's Procedures for the development of registration standards, codes and guidelines, and principles for best practice regulation*

May 2022

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

The Australian Health Practitioner Regulation Agency (Ahpra) has *Procedures for the development of registration standards, codes and guidelines* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au)

The procedures have been developed by Ahpra in accordance with Section 25 of the Health Practitioner Regulation National Law (the National Law) as in force in each state and territory, which requires Ahpra to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.

The Podiatry Board of Australia (Board) is reviewing its *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery*.

Below is the Board's assessment of its proposal for a revised *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery* against the three elements outlined in the Ahpra procedures.

## 1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law

### Board's assessment

The Board considers that the draft revised *Registration standard: Specialist registration for the podiatry specialty of podiatric surgery* (proposed revised registration standard) meets the objectives and guiding principles of the National Law.

The proposal takes into account the National Scheme's key objective of protecting the public by ensuring that only practitioners who are suitably trained and qualified to practise the podiatry specialty of podiatric surgery in a competent and ethical manner are granted specialist registration.

The proposal also supports the National Scheme to operate in a transparent, accountable, efficient, effective and fair way by clearly setting out the requirements for specialist registration for the podiatry specialty of podiatric surgery.

## 2. The consultation requirements of the National Law are met

### Board's assessment

The National Law requires wide-ranging consultation on proposed codes and guidelines. The National Law also requires National Boards to consult each other on matters of shared interest.

The Board is now undertaking public consultation on the draft revised specialist registration standard. The process will include publishing the consultation paper on the Board's website and informing health practitioners, key stakeholders and the community of the review via the Board's electronic newsletters, communique and a social media campaign. The Board will also invite key stakeholders to comment on the proposed revised registration standard including other National Boards, professional organisations, patient safety organisations, consumer groups and Aboriginal and Torres Strait Islander groups.

The Board will take into account the feedback it receives when finalising the proposed revised registration standard that it will submit to the Ministerial Council for approval.

### 3. The proposal takes into account principles for best practice regulation

#### Board's assessment

In developing the draft revised registration standard, the Board has taken into account principles for best practice regulation.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the principles expressed in the Ahpra procedures.

#### A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

##### Board's assessment

The Board proposes minor changes to an existing registration standard. There have been editorial changes to improve readability and clarify current requirements.

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 moving to the specialised practice of podiatric surgery.

This requirement has not changed. The draft revised registration standard retains this requirement and 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.

The draft revised registration standard will continue to set appropriate requirements for specialist registration in the podiatry specialty of podiatric surgery. The proposal protects the public by ensuring only practitioners who are suitably trained and qualified to practise podiatric surgery in a competent and ethical manner are granted specialist registration.

#### B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

##### Board's assessment

The proposal does not change current requirements for specialist registration and is not expected to impact on the current levels of competition among health practitioners.

The draft revised registration standard continues to set appropriate and reasonable requirements for specialist registration as a podiatric surgeon to enable suitably trained and qualified practitioners to be granted specialist registration in the podiatry specialty of podiatric surgery.

#### C. Whether the proposal results in an unnecessary restriction of consumer choice

##### Board's assessment

The proposal is not expected to result in any unnecessary restrictions of consumer choice as the draft revised registration standard does not change current requirements for specialist registration.

The proposal will enable practitioners who are suitably trained and qualified to practise podiatric surgery in a competent and ethical manner to be granted specialist registration and therefore will support access to health services provided by podiatric surgeons.

**D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved**

**Board's assessment**

The proposal does not change current requirements for specialist registration. The Board does not expect any additional costs to the public, practitioners or government.

The draft revised registration standard clearly sets out for practitioners the requirements for specialist registration for the podiatry specialty of podiatric surgery.

The public will benefit from a registration standard that ensures only practitioners who are suitably trained and qualified to practise podiatric surgery in a competent and ethical manner are granted specialist registration.

**E. Whether the proposal's requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants**

**Board's assessment**

The Board considers the draft revised registration standard has been written in plain English that will help practitioners and the public to understand the requirements for specialist registration in the podiatry specialty of podiatric surgery. The Board has changed the structure of the standard and reviewed the wording to improve readability and clarify requirements.

**F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time**

**Board's assessment**

If approved the Board will review the revised registration standard at least every five years, including an assessment against the objectives and guiding principles in the National Law and principles for best practice regulation.

However, the Board may review the registration standard earlier, in response to any issues which arise, or new evidence that emerges to ensure the standard's continued relevance, workability and maintenance of public safety standards.