Emailed 1st May 2017

Attn of Prof Michael Woods

Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions

Via email: admin@asreview.org.au

The Australasian College of Podiatric Surgeons (ACPS) welcomes the opportunity to provide stakeholder comment regarding Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions (NRAS) by Prof Michael Woods.

The ACPS is an accredited specialist surgical training college for podiatric surgeons, which, concurrently provides advocacy and representation for podiatric surgeons in Australia. The ACPS is committed to the training of podiatric surgeons to the highest standard. The scope of practice for podiatric surgery is defined by the ACPS as:

“The part of surgery that deals with the diagnosis, surgical and adjunctive treatment of diseases, injuries and defects of the human foot, ankle and associated structures”.

It the position of the ACPS that the risk profile associated with the podiatry profession’s scope of practice requires the Podiatry Board of Australia maintain its regulatory function however, notes in the 2014 submission by the AMC that “the AMC gave extensive, collegial advice to the Australian and New Zealand Podiatry Accreditation Council to assist it to develop standards and procedures for accreditation of programs in the field of podiatric surgery, which is a specialty of podiatry.” The ACPS was not privy to the AMC advice however, given the nature, risk and intricacy of accrediting a surgical training programme the ACPS would support inter disciplinary advice to the accrediting body and board to ensure that there is consistency across accreditation of surgical training. The ACPS welcomes and would encourage the Podiatry Board of Australia to engage and seek assistance in matters of surgery with the dental and medicine regulatory bodies as podiatric surgery has many parallels.

The ACPS notes the numerous comparisons to the accreditation process within the UK with suggestions to improve the economics of the process. The ACPS does not object this comparison however; a concern is the comparison to jurisdictions such as the UK, where no accreditation functions are funded by the HPC for podiatry. This fact renders an economic comparison invalid in reference to podiatry.
The ACPS provides a surgical training programme, which is modeled on existing surgical courses in Australia and internationally. In brief the minimum requirements for Fellowship of the ACPS and registration as a podiatric surgeon include:

- A degree in Podiatry
- Approved Masters degree relevant to Podiatric Surgery
- On average 6 years of surgical training with completion of the training programme with most graduates having logged in excess of 2500 surgical foot and ankle surgical teaching procedures.

Despite being registered under AHPRA and accredited by the PBA and having a unique skill set, podiatric surgeons unlike their UK counterparts have no government support for training or funding within the system and do not enjoy the parity that their international colleagues in the UK have.

The ACPS seeks advice on how health care reform may be guided to further include podiatric surgeons who are placed to positively, effectively and economically contribute to the Australian health care system in the foot and ankle.

If the process of accreditation is to be merged and streamlined it is the ACPS opinion that it would be rational to combine boards or processes of those boards whose regulatory functions have similarities. In this regard, the medicine and dentistry boards are most similar to podiatry for two reasons. Firstly, they are the only three healthcare professions with specialty recognition. Secondly, like medicine and dentistry, the scope of podiatric practice includes use of prescription medicines and surgical treatment. If NRAS were to decide to group registration boards, the ACPS recommends podiatry be grouped with medicine or dentistry as the only boards with specialty pathways.

The unique skill set and risk profile of podiatric surgery requires effective governance, regulation and accredited surgical training to ensure appropriate levels of public safety. The Australian Dental Council and Australian Medical Council provide independent accreditation for their registration boards. In the same way, the Australian and New Zealand Podiatry Accreditation Council (ANZPAC) provides the same function for the Podiatry Board of Australia. To effectively perform their function, the regulatory boards need to have specific and appropriate skills and experience. The ACPS believes the most appropriate means to deliver this for the podiatry profession, is via the Podiatry Board of Australia however, encourages inter disciplinary input from both the Medical and dental board particularly on matters of podiatric surgery.

Regarding assessment of overseas trained podiatric surgeons the ACPS appropriately positioned to provide assistance in the assessment of these practitioners and has a long history in collaboration with the podiatric surgical groups in the UK and the USA.

The ACPS appreciates the ability to provide stakeholder input.
Should you have any queries please do not hesitate to contact me.

Kind regards

Peter Manuel FACPS
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