Attention: Mr Kim Snowball/NRAS Review Team
Podiatric Surgeons
to:
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10/10/2014 09:17 AM
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Dear Mr Snowball

Review of the National Registration and Accreditation Scheme

The Australasian College of Podiatric Surgeons (ACPS) welcomes the opportunity to provide stakeholder comment regarding the review of the National Registration and Accreditation Scheme (NRAS) by Mr Kim Snowball. 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.

The ACPS acknowledges and congratulates the NRAS on its first 3 year term. Much has been achieved in line with the principles of the National law.

The ACPS feels many of the potential improvements noted in the review, have merit, but wishes to draw the review team’s attention to some specific issues which relate to the podiatry professional and podiatric surgery as a specialty of the Podiatry Board of Australia (PBA).

The ACPS is concerned that there is a proposal for smaller boards to merge on what appears to be purely economic grounds. The ACPS believes that there is not solid evidence for such a proposal. Of 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.

Furthermore, if such a proposal is to be considered, then it would be more rational to combine 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. Further, 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".”


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 needs 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.

Whilst the ACPS recognises the significant efforts by the PBA and AHPRA, there has been to date, insufficient consideration to removing barriers to ongoing development and viability of podiatric surgery as a specialty area of surgical practice. The review team should consider advising
government on the need to continue to reduce barriers to practice such as:
- lack of MBS rebate for services of podiatric surgeons;
- reduction of barriers to use of scheduled medicines (State legislative reform and broadening of medicines available for podiatric surgery); and
- encouragement of local health authorities to prevent discrimination and encourage inclusion of podiatric surgical services.

The ACPS is concerned any change to current arrangements or grouping of the PBA with other disciplines that do not have specialist recognition and similar risk profiles, will reduce public health and safety. The PBA should maintain its current role. If NRAS were to decide to group registration boards, the ACPS recommends podiatry be grouped with medicine or dentistry.

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

Kind regards

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