



**BEFORE THE DISCIPLINARY COMMITTEE OF PAKISTAN MEDICAL COMMISSION**

In the matter of

Complaint No. PF. 8-2033/2021-DC/PMC

Referred from office of the President of Pakistan

Mr. Ali Raza	Chairman
Dr. Anis-ur- Rehman	Member
Dr. Asif Loya	Member

*Present:*

Dr. Ammara Saad Hashmi (17080-N)	Respondent
Hearing dated	15.01.2022

**I. FACTUAL BACKGROUND:**

1. A petition addressed to the President of Pakistan was forwarded by Director (Petition & Digitization) President's Secretariat (Public) Aiwan-e-Sadr received at the Pakistan Medical Commission (the Commission) on 01.11.2021. In the said petition reference was made to the public notices issued by the Pakistan Medical Commission regarding prohibition to unlawful use of the specialization titles by medical practitioners without having requisite qualifications. In the petition certain medical practitioners were identified who have been granted license to practice basic medicine or dentistry as general practitioners and were allegedly representing themselves as consultants or specialists. It was further alleged that such individuals/practitioners are practicing in clear violation of section 29(2) of the Pakistan Medical Commission Act, 2020.

2. Similar petition was lodged to the President of Pakistan Medical Commission vide a letter received on 20.10.2021. Also, in-charge Federal Investigation Agency, Cyber Crime forwarded the same petition vide letter dated 05.11.2021 which was received on 10.11.2021.
3. The petitions mentioned the names and detail of medical practitioners allegedly involved in the specialized dermatology/aesthetic procedures without requisite qualifications. Name of Dr. Ammara Saad Hashmi (hereinafter referred to as the “Respondent”) was also mentioned in the petition.

## II. SHOW CAUSE NOTICE:

4. In view of the allegations leveled in the complaint, Show Cause Notice dated 08.11.2021 was served to Dr. Ammara Saad Hashmi (17080-N) in the following terms:
  5. **WHEREAS**, in terms of Information, evidences available on record and social media networking accounts such as, <https://www.instagram.com/ammaraaadhashmi/?hl=en>, [https://www.facebook.com/pages/category/Doctor/dr\\_amarasaad\\_official-2831957770154291/](https://www.facebook.com/pages/category/Doctor/dr_amarasaad_official-2831957770154291/), you are practicing and running clinic at Apartment-115, Ground floor, Silver Oaks, F-10, Islamabad and have published information and represented yourself as Dermatologist, Aesthetic Physician & Laser Specialist; and
  6. **WHEREAS**, you are registered with Pakistan Medical Commission under Registration No: 17080-N, whereby you have got the degree of Basic Medical Qualification (MBBS) only; and
  7. **WHEREAS**, a general practitioner cannot practice in the field of specialty without requisite qualification duly recognized by the Commission and represent as having acquired or seek to practice a specialty unless same is recognized by the Commission. Therefore, in view of facts mentioned in this notice your conduct of representing yourself as a specialist is in violation of Section 29 (2), (8) & (10) of the Act, read with Regulation 8 (2) of Code of Ethics of Practice for medical and dental practitioners, Regulations, 2011; and
  8. **WHEREAS**, it is observed that, your current registration status as per record of this Commission is inactive as your registration has been expired in Dec, 2020, while you are running a clinic with the name and style “ASH



Dermatologist & Aesthetician Clinic, Apartment-115, Ground floor, Silver Oaks, F-10, Islamabad” and till the issuance of this notice regularly practicing as per the timing of clinic i.e. (10 am to 5 pm); and

9. **WHEREAS**, every licensed practitioner is responsible to maintain his license as valid and in good order. A practitioner shall not be permitted to practice in the absence of a valid **license** issued by the Commission. Your conduct to continue practice in absence of a valid license is in violation of Section 29 (7) of the Act, read with Regulation 7 (2) of Code of Ethics of Practice for medical and dental practitioners, Regulations, 2011; and

### **III. REPLY TO SHOW CAUSE NOTICE:**

5. Dr. Ammara Saad Hashmi did not submit her reply to Show Cause. She feeling aggrieved of Show Cause Notice filed a Civil Suit for declaration and permanent injunctions against PMC in the Court of Senior Civil Judge, Islamabad. The learned Civil Judge, Islamabad vide order dated 22.12.2021 announced on 23.12.2021 directed to maintain the status quo in the matter.

### **Appeal against order of Civil Judge, Islamabad:**

6. PMC assailed the order dated 22.12.2021, of learned Civil Judge, Islamabad in the Court of District Judge, West Islamabad. Ms. Abida Sajjad learned Additional District Judge, West Islamabad vide order dated 08.01.2022 suspended the operation of the order dated 22.12.2021 passed by the learned Civil Judge, Islamabad. The court allowed to conduct proceedings in the instant complaint however restrained the PMC from passing final order in the matter.

### **IV. HEARING:**

7. Notice dated 30.12.2021 was issued to Respondent Dr. Ammara Saad Hashmi directing her to appear before the Disciplinary Committee on 15.01.2022. The Respondent appeared in person before the Disciplinary Committee along with Mr. Saad Hashmi Advocate on the said date.
8. The Committee asked the Respondent doctor about representing herself as qualified dermatologist / Aesthetic Physician on social media as well on the advertisement of her clinic, whereas, she is registered with PMC as MBBS only, to which she responded that, she has never represented herself as dermatologist. She further stated that she will remove all such





advertisement from different websites / social media and submit a compliance report to the satisfaction of the Disciplinary Committee.

9. Respondent Dr. Ammara Saad Hashmi stated that she has done CME training from Dr. Humayun's institution. She is also doing a certification level VII course from Harley Academy, London, which is a 24 months' course and duly regulated by UK government. Some parts of the course are online training and also include short physical training. The foreign candidates are offered to complete their physical/assisted training at their convenience. There is also an examination/evaluation to clear the said certification program. The Committee enquired whether she has the course work and syllabus of the certification course to which she replied affirmatively. She further submitted that she will provide course work and syllabus for perusal of the Committee.
10. The Respondent doctor stated that she has also done MCPS (dermatology) training but has not yet cleared exam. She further submitted that she will remove the title of dermatologist/consultant/specialist from her visiting card, prescription pad and from social media accounts as well as other websites.
11. The Disciplinary Committee enquired whether she has done Basic Life Support (BLS) and Advanced Cardiac Life Support (ACLS) training, she replied affirmatively. She further confirmed that she has applied for registration of her clinic with Islamabad Healthcare Regulatory Authority (IHRA).
12. On query of the Disciplinary Committee regarding suit filed by her in the court of learned Civil Judge, Islamabad against the Commission, she stated that she has filed an application to withdraw her suit.
13. The Disciplinary Committee directed Respondent Dr. Ammara to remove words, titles such as consultant, dermatologist used and advertised with her name on her prescription pad, visiting card, different websites and social media sites and submit a compliance report within two days in this regard.

## V. FINDINGS AND CONCLUSION:

14. It is pertinent to mention here that in September 2021, the Pakistan Medical Commission widely circulated through public notice on its website and newspapers and warned all medical practitioners against using misleading titles with their names which cause misrepresentation to the general public and patients as to their qualifications and skills. It was made abundantly clear in the public notice that such misrepresentation as to specialized medical and dental practice is in violation of the code of ethics and tantamount to misconduct. In addition, such act is in gross violation of the PMC Act 2020 and mandates a disciplinary action against medical and dental practitioners involved in such deceptive practices.
15. Petition that was forwarded from the Office of President and FIA referred to the same public notice of the Pakistan Medical Commission and provided a list of medical practitioners who allegedly are carrying out practice in dermatology and aesthetics without requisite qualifications. Further the Authority has carried out its preliminary assessment of such cases resulting in collection of relevant evidence. Therefore, Disciplinary Committee proceeded to issue show cause notice based on sufficient information available to it and submission of a complaint.
16. As per available record the Respondent doctor is running a clinic at Apartment-115, Ground floor, Silver Oaks, F-10, Islamabad. She has represented herself at her clinic and on different websites such as <https://www.instagram.com/ammaraasadhashmi/?hl=en>, [https://www.facebook.com/pages/category/Doctor/dr\\_amarasaad\\_official-2831957770154291/](https://www.facebook.com/pages/category/Doctor/dr_amarasaad_official-2831957770154291/), as Dermatologist, Aesthetic Physician & Laser Specialist.
17. The Respondent doctor during the hearing stated that she is practicing as aesthetic physician only and she will remove title of Dermatologist/consultant/specialist used with her name at her clinic or the abovementioned social media accounts as well as different websites.
18. It is a matter of record that the Respondent doctor is registered with the PMC under registration number 17080-N and she holds MBBS degree only. There is no post graduate degree/qualification registered in her name with the PMC.



19. It is important to mention here that a medical or dental practitioner can represent and practice only a specialty which is duly recognized and consequently registered on their license by the PMC. Medical practitioners who have been granted license to practice basic medicine or dentistry as a general practitioner cannot practice a specialty or use specialization or consultant titles with their names as it amounts to deceiving the general public. Section 29 of the Pakistan Medical Commission Act 2020 explicitly prohibits in this regard as under:

***Section 29. Licensing***

*“(2) A general practitioner may treat all ordinarily recognized common medical or dental ailments and shall not practice in fields or specialties, as recognized by the Commission for which formal training is required ..... No practitioner shall represent himself as a specialist or practice as a specialist without having appropriate qualifications, recognized and duly registered by the Commission. ....”*

Sub-section (8) provides:

*“(8) No medical or dental practitioner shall be permitted to represent in Pakistan as having acquired or seek to practice a specialty unless the same is duly registered on his license by the Authority. ...”*

Furthermore, Sub-section (13) provides:

*(6) No registered licensee shall use or publish in any manner whatsoever any title, description or symbol indicating or intended to lead persons to infer that he possesses any additional or other professional qualification unless the same has been duly recognized and registered on his licence by the Commission.*

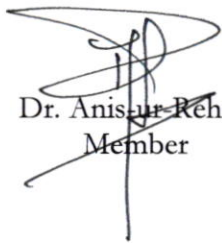
20. Dermatology is a specialist field of medicine which can only be practiced by a practitioner having acquired the requisite post graduate qualification in dermatology. Diplomas, certifications and other such qualifications are considered additional qualification and where the same pertain to the specific practice of dermatology the same are valid for further credentialing of a holder of a post graduate qualification. However, there are numerous diplomas and certifications in aesthetic medicine and cosmetology which are not specifically training in a medical specialty or the general practice of medicine rather are more in technical nature and in most cases consist of a few days training at nonmedical facilities such as hotels or convention centers etc. These

cannot be equated with medical qualifications. The field of aesthetic medicine has been loosely used over many years whereas in reality it is the practice of aesthetics or cosmetology which consists of procedures which may not be strictly speaking a practice of medicine yet have either medical consequences or cross over into the practice of medicine in part. A more recognized term for medical practitioners involved in the practice of aesthetics is an 'aesthetic physician'. However, unfortunately over the years no effort has been made to define the credentialing pathways or privileging structure for an aesthetic physician and correspondingly those practices which fall in the domain and definition of technicians or the sphere of allied health. This vacuum has resulted in the increasingly growing practice of aesthetics and cosmetology to be unregulated to a large extent. While it would be incorrect and unreasonable to generally limit all practice of aesthetics or cosmetology to only those who are qualified specialists in dermatology which is a wholly distinct specialty of medicine, it is imperative that the practice of aesthetics medicine be properly defined and credentialed.

21. What is relevant to the Pakistan Medical Commission as the national regulator of medical practices is what is commonly referred to as "Aesthetic Medicine". Aesthetic medicine is a broad term for specialties that focus on altering cosmetic appearance through the treatment of conditions. It includes non-invasive procedures such as injectables including fillers, botulinum toxins, mesotherapy etc., rejuvenation treatments such as chemical peels, photorejuvenation etc., laser treatments, hair transplant etc. On the other hand, Aesthetic Medicine also includes surgical or reconstructive procedures which requires qualified surgeons and specialists.
22. It has become abundantly clear that there is an urgent need to determine the scope of Aesthetic Medicine and its credentialing as in the absence of the same it is not possible to enforce the limits of practice on medical practitioners engaged in the practice of aesthetics and cosmetology, as well as those who are not medical practitioners and are practicing essentially as technologists. The absence of this clarity critically has created a confused state of affairs amongst the public and patients who are simply proceeding on the basis of marketing representations made by practitioners and clinics etc. As a result, the Authority is directed to immediately take up this issue and initiate a consultative process to prepare detailed credentialing for aesthetic medicine and guidelines for its practice whereupon the Council's approval be sought for its notification and consequent implementation.



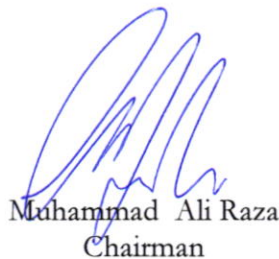
23. However, in the interim it is essential to ensure that no medical practitioner incorrectly represents themselves as a 'dermatologist', 'consultant' or 'specialist' in the absence of having acquired a recognized post graduate qualification registered with the Pakistan Medical Commission. This needs to be publicly communicated as well.
24. Dr. Ammara has submitted a compliance report after the hearing vide letter dated 19.01.2022 whereby she forwarded her prescription pad and visiting card showing her qualification as MBBS. From her Facebook page i.e. [https://www.facebook.com/pages/category/Doctor/dr\\_amarasaad\\_official-2831957770154291/](https://www.facebook.com/pages/category/Doctor/dr_amarasaad_official-2831957770154291/). the word 'Dermatologist' has been removed.
25. In view of the above discussion and the admitted absence of a proper credentialing system for aesthetic medicine and also considering the compliance report submitted by Dr. Ammara, the Committee has decided that no penalty shall be imposed upon Respondent doctor. However, Dr. Ammara is directed that if any third party without her consent represents her as dermatologist, consultant or specialist, she will initiate appropriate steps to have it corrected on an immediate basis.



Dr. Anisur Rehman  
Member



Dr. Asif Loya  
Member



Muhammad Ali Raza  
Chairman

28 February, 2022