



BEFORE THE DISCIPLINARY COMMITTEE OF PAKISTAN MEDICAL COMMISSION

In the matter of

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

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

Present:

Dr. Mahreen Saeed (7848-N)	Respondent
Hearing dated	10.12.2021

I. FACTUAL BACKGROUND

1. A petition addressed to President of Pakistan was forwarded by Director (Petition & Digitization) President's Secretariat (Public) Aiwan-e-Sadr received in Pakistan Medical Commission office 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, incharge Federal Investigation Agency, Cyber Crime forwarded the same the petition vide letter dated 05.11.2021 which was received on 10.11.2021.

3. The petitions mentioned the names and detail of the medical practitioners alleged involved in the specialized dermatology/aesthetic procedures with requisite qualifications which included Dr. Mahreen Saeed (7848-N), (hereinafter referred to as the Respondent).

II. SHOW CAUSE NOTICE

4. In view of the allegations leveled in the abovementioned petition/complaint, a show cause notice dated 08.11.2021 was served to Respondent in the following terms:
 5. Whereas, in terms of information and evidence available on record and social media accounts such as <https://www.linkedin.com/in/mehreen-saeed>, <http://www.facebook.com/noesisgrouppakistan/photos/dr-mehreen-mujtaba-is-a-islamabad-based-practitioner-who-uses-genuine-restylane-/495702683966994/>, you are practicing at Dr. Mehreen Mujtab's clinic at Plot-14 opposite Meezan Bank, I&T Center Jehlum Road, G-8/4, Islamabad and have published information and represented yourself in the following manner: Dr. Mehreen Saeed (Associate Consultant Dermatologist), Ph.D Fellow at Florida international University (USA), M.Phil, Quaid-e-Azam University (PK), PGD HRH, Queen Margaret University Edinburgh (UK), M.Sc Dermatology Cardiff University (UK), Fellowship American Board of Anti-Aging and Restorative Medicine (USA), Diplomate American Academy of Aesthetic Medicine (USA), Certificate course in Fat Grafting and PRP, American Academy of Aesthetic Medicine.
 6. Whereas, you are registered with Pakistan Medical Commission under Registration No.7848-N, whereby you have 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 December 2011, while you are running a clinic with the name and style "Dr. Mehreen Mujtaba's Clinic Plot-14 opposite Meezan Bank, I&T Center Jehlum Road, G-8/4, Islamabad" and till the issuance of this notice regularly practicing as per the timing of clinic i.e. (09:00am to 05:00pm); 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. Respondent in response to show cause notice submitted her reply/comments on 29.11.2021 wherein she stated that:

- a) The subject notice defines the president's Secretariat (Public) letter dated 26.10.2021 as Information. The examination of the said Information does not reveal any detail or allegation against my name. However, beyond the said 'Information' the Commission has mentioned a facebook and a LinkedIn account in para-5 of show cause notice at its own as no such social media accounts were mentioned in the so called 'Information' neither run or owned or registered by the respondent.
- b) To my satisfaction, I have visited the above referred social media account links, as provided by the PMC, and found that the information/ evidence appears fake as the published information relating to me, as referred to in the subject notice, are extracts from the Facebook Account of M/S Noesis Group Pakistan.
- c) Also, the LinkedIn account mentioned in the subject notice belongs to an educationist/researcher based in USA with the same name. Allegations against me are based on social media accounts belonging to other parties, for which the undersigned cannot be held accountable for.
- d) My professional work at La Chirurgie, I&T Centre, Jhelum Road, G-8/4 Islamabad is purely in accordance with my academic/ professional qualifications and that, I have never published any irrelevant or fake qualification.
- e) I am not registered with PMC under registration No. 55186-P. My resume along with attested copies of registration/ degrees/ diplomas certificates are attached for your reference. I would reiterate that I have not represented myself as a specialist and hence have not violated Section 29 (2), (8), (10) of the Act. I am practicing Aesthetic Medicine and work part time in an aesthetic/cosmetic facility.
- f) I hold a renewed registration/ license as per law. Registration No. 7848-N is attached. It is further clarified that I don't run my own practice referred to in the show cause notice as Dr. Mehreen Mujtaba's Clinic. I work on a share basis in the clinic named "La Chirurgie" which is facility for Aesthetic/ Cosmetic procedures, located in I&T Centre on Jhelum Road, G-8/4 Islamabad. I do part time practice (4-6 hours a week) in the above-mentioned Aesthetic and Cosmetic Centre.

IV. HEARING

6. A hearing notice dated 29.11.2021 was issued to Respondent Dr. Mahreen Saeed directing her to appear before the Disciplinary Committee on 10.12.2021.

7. At the beginning of the hearing Respondent Dr. Mehreen stated that Disciplinary Committee has taken action on an anonymous complaint. She is not working in any field of specialty for which requisite qualification is required to be registered with Pakistan Medical Commission. She is not practicing as dermatologist rather she carries out aesthetic procedures on part time basis at a clinic in G-8, Islamabad.
8. The Respondent doctor stated that the social media accounts which have been referred to in the show cause notice do not belong to her and that she does not have the knowledge who uploaded the information there about her.
9. The Committee inquired about the Facebook page of Restylene, where in 2016 the Respondent Dr. Mehreen was presented as a brand ambassador for Restyle derma products and the information about the Respondent doctor was uploaded referring her as a 'dermatologist' and the address of her F/8 clinic was also given. The Respondent replied that this social media account belongs to the company Restylene and not her. The information was published without her permission as she was out of country on full-bright scholarship for her Ph.D from United States in 2016. She was asked whether she contacted the said company to remove the information which was uploaded without her consent and was easily accessible through internet. The Respondent replied she does not have Facebook account thus she cannot access any information on Facebook. However, she admittedly took no action to correct the information available on multiple websites misrepresenting her qualification or status.
10. The Committee inquired about information shared on Pak-info medics about the Respondent doctor Mehreen referring to her as Associate Consultant Dermatologist at the Shifa Medical Centre which was initially negated by the Respondent as she was not unaware of the website. However, the Respondent doctor confirmed that she had been practicing at Shifa Medical Centre of Shifa International Hospital in F-11 as Associate Consultant Dermatologist for 02 years on the basis of Diploma (Dip-Derm) which she did from the Cardiff University, Cardiff Wales, UK.
11. The Committee inquired about practice of the Respondent doctor in aesthetics to which she responded that she has done 2-3 certificate courses in aesthetic medicine from American

Academy of Aesthetic Medicine, US and Aptos, Georgia. The Respondent stated that a number of doctors in US and UK are practicing aesthetics on the basis of these certificates.

12. The Committee inquired from her about practicing without a valid license for 10 years as her license had expired in 2011. The Respondent doctor responded that she has been going out of the country frequently which is a reason for not renewing her license. She further added that she has however, renewed her license as soon as she received the Show Cause Notice from Disciplinary Committee.

V. FINDINGS AND CONCLUSION

13. In so far as the concern raised by the Respondent Dr. Mehreen that the Disciplinary Committee proceeded to issue show cause notice on an anonymous complaint it is clarified that the said complaint was forwarded by the President of Pakistan and thus is not an anonymous complaint. In fact, Disciplinary Committee has also received formal request from the Director (Petition & Digitization) President's Secretariat (Public) Aiwan-e-Sadr whereby a petition address to the President of Pakistan has been forwarded to take action against the medical practitioners who are practicing without requisite qualifications. Similar petition have been forwarded by the FIA. The Disciplinary Committee even otherwise has the mandate to take action of its own motion where information comes into the knowledge of the Pakistan Medical Commission of a violation of any regulatory provision by a practitioner.
14. 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 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 has proceeded to issue show cause notice based on sufficient information available to it and submission of a complaint.

16. Respondent Dr. Mehreen has submitted her resume along with her reply to the show cause notice which provides the list of qualifications she has attained in her career. According to the documents and resume she is carrying out aesthetic procedures as an aesthetic physician and has following academic qualifications to justify her ability to undertake aesthetic procedures:

- MBBS, Khyber Medical College, Peshawar, Pakistan. 1996.
- PG DipDerm, Cardiff University, Cardiff, Wales, UK, 2008.

Certifications in Aesthetic Procedures:

- Certification In Aesthetic Medicine, Fat Grafting, American Academy of Aesthetic Medicine, Arizona USA & Malaysia.
- Certificate In thread lifting methods by Aptos.

17. The Respondent doctor has also admitted her practice as Associate Consultant Dermatologist at the Shifa Medical Centre of Shifa International Hospital in F-11 for 02 years from 2009 to 2010 on the basis of Diploma (Dip- Derm) which she did from the Cardiff University, Cardiff Wales, UK.

18. 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 (6) 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.

Further 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. ...”

19. 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 non medical 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 credentialled.

20. 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.
21. It has become abundantly clear that there is an urgent need to determine the scope of Aesthetic Medicine and its credentialling 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.
22. 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.
23. In view of the above discussion and the admitted absence of a proper credentialling system for aesthetic medicine, no further action may be taken on this account against the Respondent doctor. However, the Respondent is directed to immediately ensure that she does not in any

manner use the terms ‘dermatologist’, ‘consultant’ or ‘specialist’ to represent herself and if any third party has without her consent done so to initiate appropriate steps to have it corrected on an immediate basis. Failure to do so will result in action being taken against the Respondent for misrepresenting her credentials.

24. On the additional issue of the Respondent having failed to validate her license as required and continued his practice without a valid license for 10 years, it is an admitted position that she failed to renew her license and continued to practice medicine without a valid license having only renewed her license after issuance of the Show Cause Notice. More so she continued to in fact undertake clinical practice without a license and her justification that because she was travelling a lot she did not renew her license is misplaced as it’s an admitted fact that during these ten years she practiced medicine in Pakistan constantly..

25. As per sub-section (2) of 32 of Pakistan Medical Commission Act, 2020 the license of a practitioner which has expired or who has not successfully re-validated within the time prescribed shall be deemed to be suspended until such time as it is revalidated in the prescribed manner. The said provision is reproduced below for reference.

Section 32 (2)

The license of a practitioner which has expired or who has not successfully re-validated within the time prescribed shall be deemed to be suspended until such time as it is revalidated in the prescribed manner

Furthermore, section 29 (7) of the PMC Act, 2020 provides that every licensed practitioner shall be 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 authority. The said provision is reproduced hereunder:

Section 29 (7)

Every licensed practitioner shall be 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 authority.

26. In view of foregoing, a fine of PKR 200,000/ (Two Hundred Thousand Rupees) is imposed on Respondent Dr. Mehreen for failure to validate her license for 10 years and continuing to practice without a valid license. Dr. Mehreen is directed to pay the amount of fine in the designated bank



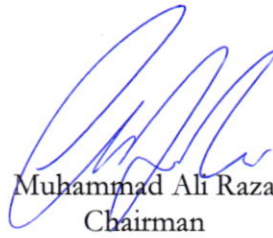
of the Commission within fourteen (14) days from the issuance of this decision and forward a copy of the paid instrument to the office of the Secretary to the Disciplinary Committee, failing which license of the Respondent doctor shall be deemed to be suspended and shall remain suspended until such time the fine is paid., irrespective of the same having been renewed during this period by Dr. Mehreen.



Dr. Anis ul Rehman
Member



Dr. Asif Loya
Member



Muhammad Ali Raza
Chairman

28 February, 2022