



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. Nosheeba Salman(38378-P)	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. Nosheeba Salman (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. Nosheeba Salman (38378-P) in the following terms:
 5. **WHEREAS**, in terms of information, evidence available on record and social media accounts such as, <https://www.facebook.com/drnosheebas/>, <https://www.instagram.com/drnosheebas/?hl=en>, <https://www.twitter.com/drnosheebas>), you are practicing and running a Clinic; Skin Solutions at office-101 1st Floor, Islamabad Diagnostic Centre F8 Markaz, Islamabad and have published information and represented yourself in the following manner; Dr. Nosheeba Salman (Dermatologist & Cosmetologist) AAAM (USA) MCPS (Dermatology-PIMS), Diploma in Dermatology (UK); and
 6. **WHEREAS**, you are registered with Pakistan Medical Commission under Registration No. 38378-P, 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

III. REPLY TO SHOW CAUSE NOTICE:

5. Dr. Nosheeba Salman in response to Show Cause Notice submitted her reply/comments on 03.12.2021 wherein she stated that:

Decision of the Disciplinary Committee in the matter of Complaint No. PF.8-2033/2021 (Dr. Nosheeba Salman)

- a) The contents of Para No.5 of Show cause are denied except the fact that the Answering Respondent is practicing at Office No. 101, 1st Floor, Islamabad Diagnostic Centre, F-8 Markaz, Islamabad. In addition, thereto, the web links mentioned in the corresponding para under reply do not belong to her and any kind of information available at such web links cannot be attributed to her. Even the talks posted on YouTube by her never carry any false introduction as a dermatologist or a cosmetologist nonetheless a handful of websites or posts if add such titles are not done at her behest. She has never represented herself as a dermatologist or a cosmetologist.
- b) She writes AAAM (US) since she has the certification and Post Graduate Diploma in Dermatology from the United Kingdom. She performs aesthetic procedures having certifications however she represents herself as a General Practitioner in accordance with registration with the PMC.
- c) Please refer to Pakistan Medical Commission Minutes (Eighth Council Meeting, Friday June 25, 2021) held at PMC, Islamabad- Decision- The Council unanimously decided that online Diploma in Dermatology from University of Wales UK (Distance Learning) attained by one of the doctors couldn't be considered as a post graduate qualification. It was further decided that no online, distance learning program will be recognized as postgraduate/additional/alternative qualifications for full time practicing license. Nonetheless, it was clearly prescribed such qualification(s), though, could be mentioned on the individual's resume or personal portfolio.
- d) Since she has never represented herself as a Specialist, therefore, no penalty be imposed on her. All the allegations levelled through the referred complaint are baseless and no misconduct or any violation of law could be attributed to her.

IV. HEARING:

6. Notice dated 30.12.2021 was issued to Respondent Dr. Nosheeba Salman directing her to appear before the Disciplinary Committee on 15.01.2022. Dr. Nosheeba appeared along with her counsel on the said date.
7. The Committee inquired the Respondent doctor about her representation as dermatologist/ consultant / specialist on social media as well on the advertisement of her clinic namely Skin Solutions whereas she is registered with PMC as MBBS only, to which she stated that she has never represented herself as dermatologist.
8. The Committee inquired if the clinic namely Skin Solutions is registered with the IHRA or not, to which she responded that she has applied for the registration with IHRA, however, the registration process is not completed as yet.

9. The Committee inquired the Respondent about the trainings she completed for practicing in the field of aesthetics medicine. Respondent doctor explained that she did level 1 of aesthetic medicine from Florida (USA). The duration of level 1 was five days which includes basic lasers, chemical peels, botox and fillers. She stated that it was 5 days training. On the 6th day there was a written exam and on 7th day the candidates are directed to perform all those procedures on the patients. The Respondent doctor further stated that she has completed 7 levels.
10. The Committee asked as if the said training course is recognized as a post graduate qualification. The Respondent doctor replied that the said course is recognized as CME and not as post graduate or additional qualification.
11. On inquiring by the Committee, the Respondent doctor confirmed that she has not yet done Basic Life Support (BLS) certification.
12. The Disciplinary Committee directed Respondent Dr. Nosheeba Salman 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 02 days in this regard.

V. FINDINGS AND CONCLUSION:

13. 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.
14. 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 proceeded to issue show cause notice based on sufficient information available to it and submission of a complaint.

15. Respondent doctor is practicing and running a Clinic; Skin Solutions at office-101 1st Floor, Islamabad Diagnostic Centre F8 Markaz, Islamabad. She has published information and represented herself on different websites social media sites including, <https://www.facebook.com/drnosheebas/>, <https://www.instagram.com/drnosheebas/?hl=en> (<https://www.twitter.com/drnosheebas>), in the following manner:

Dr. Nosheeba Salman (Dermatologist & Cosmetologist) AAAM (USA);
MCPS (Dermatology-PIMS);
Diploma in Dermatology (UK).

16. The Committee has noted that the Respondent doctor in her written reply and during the hearing took the stance that she is practicing as an aesthetic physician at her clinic. She has submitted following academic qualifications certificates/diplomas which she has attained in her career, to justify her ability to undertake aesthetic procedures:

- a) MBBS, Islamia University, Bahawalpur, Pakistan. 2001.
- b) PG Diploma Medical Specialism (Dermatology) Middlesex University, UK, 2017.
- c) Certificate in Aesthetic Medicine, American Academy of Aesthetic Medicine, USA, 2007
- d) Certificate in Aesthetic Medicine, American Academy of Aesthetic Medicine, USA, 2011
- e) Certificate in Facial Aesthetic, American Academy of Aesthetic Medicine, USA, 2021
- f) Continuing Medical Education Certificate in Facial Aesthetics, 2021
- g) Certificate of Harley Academy Foundation Day Botulinum Toxin Type A and Derma Fillers
- h) Certificate of Mint Thread POD Ultra V 2018
- i) Certificate of introduction to skin care and chemical peels, 2013
- j) Certificate of attendance of Facial Aesthetic Conference 2017
- k) Certificate of training in Medical Laser, 2004
- l) Certificate of training for the long pulsed Medical Laser, 2004
- m) Certificate of participation in Macrolane Workshop, 2009
- n) Certificate of Hands on Session on MALI

17. As per the record, Dr. Nosheeba Salman is simple MBBS and she has no post graduate qualification registered with Pakistan Medical Commission.

18. It is also 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 license by the Commission.

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 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.

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 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.
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.

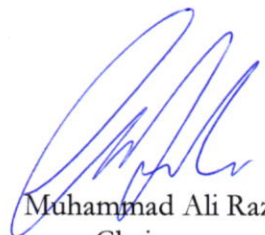
23. Dr. Nosheeba has submitted a compliance report after the hearing vide letter dated 17.01.2022 wherein she stated that she has lodged a written complaint to Federal Investigation Agency, Cyber Crime Wing against the websites owners who have represented her as Dermatologist Cosmetologist or Specialist on the following websites Marham, www.health.hamariweb.com, www.medical.com.pk, www.myelaaj.com. The said information has been verified. She further submitted that she undertakes that in future no such representation including the representation as dermatologist/Cosmetologist/Specialist will be allowed on the websites under her control and she will adhere to the professional ethics and code of conduct.
24. 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. Nosheeba Salman, the Committee has decided that no penalty shall be imposed upon Respondent doctor. However, Dr. Nosheeba 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. Anis-ur-Rehman
Member



Dr. Asif Loya
Member



Muhammad Ali Raza
Chairman

28 February, 2022