



BEFORE THE DISCIPLINARY COMMITTEE OF PAKISTAN MEDICAL COMMISSION

In the matter of

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

Reference from office of the President of Pakistan

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

Present:

Dr. Nada Hassan Syed (10409-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. Nada Hassan Syed (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. Nada Hassan Syed (10409-N) in the following terms:
 5. **WHEREAS**, in terms of information, evidence available on record, website (<https://dr-nada-hassan-syed-skin-and-aesthetics-clinic.bussinesss.site/>), and social media networking accounts such as, (@skinandaesthetics2020)-Instagram, <https://www.instagram.com/skinandaesthetics2020/?hl=en>, you are practicing at Nada Hassan Syed skin and aesthetics Clinic at House 161 St. 47 F-10/4, Islamabad and have published information and represented yourself in the following manner;
Dr. Nada Hassan Syed (Certified Dermatologist)
R.M.P,
DPD Dermatology Cardiff University (UK),
Registered SCFHS- (Dermatology) Saudi Commission for health Specialties,
DCPS Dermatology
(PG) Pakistan Institute of Medical Sciences (PIMS) Islamabad; and
 6. **WHEREAS**, you are registered with Pakistan Medical Commission under Registration No.10409-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

III. REPLY TO SHOW CAUSE NOTICE:

5. Dr. Nada Hassan Syed (10409-N) in response to Show Cause Notice submitted her reply/comments on 07.12.2021 wherein she stated that:
 - a) She is a registered practitioner w.e.f. 23.01.2003 vide registration No. 10409-N and is authorized to carry out any Medicine, Surgery, Obstetrics and Gynecology procedure deemed appropriate for the welfare and betterment of her patient.
 - b) She is registered as General Practitioner and practicing as the same. The allegation that she is representing as a certified dermatologist and a specialist, is contrary to the facts and misconceived because she has neither practiced as a dermatologist/specialist nor ever she was posted in that capacity anywhere.
 - c) It is therefore most respectfully requested that the instant show cause notice may be withdrawn.

IV. HEARING:

6. Notice dated 30.12.2021 was issued to Respondent Dr. Nada Hassan Syed directing her to appear before the Disciplinary Committee on 15.01.2022. The Respondent doctor appeared before the Disciplinary Committee along with her counsel Zeeshan Ali Syed.
7. The Committee asked the Respondent doctor about representing herself as qualified dermatologist, whereas, she is registered with PMC as MBBS only, to which she responded that she never represented herself as dermatologist as she does not possess the requisite qualification for it.

8. The Committee further inquired as to what procedures are being carried out by the Respondent to which she replied that she is practicing Aesthetic procedures including hydra facial, hair removing laser, beauty machines and PRP's.
9. The Committee asked the Respondent about the specific training to undergo all these procedures to which she responded that there is no institute which offers such training, however the companies which supplied the machines gave her necessary trainings. She further stated that she has done workshop for PRP by a foreign delegation under the supervision of Dr. Hamayun.
10. The Committee inquired about the duration of workshop and the institution which issued the certificate, the Respondent doctor stated that it was a one-day workshop and the issuing authority was Academy of Aesthetic Medicine and Surgery. The workshop was conducted in Serena Hotel.
11. The Committee further inquired if the Respondent doctor has done any other training in aesthetics, to which she responded that, she had not done any other training in aesthetics but have done DCPS (Diploma of College of Physician & Surgeon) two years training in Dermatology from PIMS but couldn't clear the final exam. She added that she has done Diploma in Dermatology from Cardiff University.
12. The Committee confronted the Respondent doctor with social media advertisement where she offers different treatments options to patients with guarantee as a certified dermatologist, the Respondent could not give any satisfactory answer.
13. The Committee asked the Respondent if she had done Basic Life Saving (BLS) training, to which she responded that she has not done the BLS as yet but as she is going to appear in the upcoming DCPS exam and BLS is the pre-requisite of that examination so she will do it without further delay.
14. The Disciplinary Committee directed Respondent Dr. Nada Hassan 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 03 days in this regard.

V. FINDINGS AND CONCLUSION:

15. 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.
16. 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.
17. As per available record the Respondent doctor is practicing at Nada Hassan Syed skin and aesthetics Clinic at House 161 St. 47 F-10/4, Islamabad. She has represented herself on different websites i.e. (<https://dr-nada-hassan-syed-skin-and-aesthetics-clinic.business.site/>), and social media networking accounts such as, (@skinandaesthetics2020)-Instagram, <https://www.instagram.com/skinandaesthetics2020/?hl=en>, in the following manner;

Dr. Nada Hassan Syed (Certified Dermatologist)
R.M.P,
DPD Dermatology Cardiff University (UK),
Registered SCFHS- (Dermatology) Saudi Commission for health Specialties,
DCPS Dermatology
(PG) Pakistan Institute of Medical Sciences (PIMS) Islamabad;

18. The Disciplinary Committee has noted that the Respondent doctor during the hearing claimed that she is practicing Aesthetic medicine and the procedures carried out by her includes hydrafacial, hair removing laser, beauty machines and PRP's. The Disciplinary Committee further noted that when the Respondent was asked about any specific training in the field of Aesthetic Medicines, the Respondent stated that there is no institute which offer such training, however, the companies which supplied the machines gave her necessary trainings. She further stated that she has done workshop for PRP by a foreign delegation under the supervision of Dr. Hamayun and the duration of the workshop/training was one day.
19. It is also a matter of record that the Respondent doctor is registered with the PMC under registration number 10409-N and she holds MBBS degree only. There is no post graduate degree/qualification registered in her name with the PMC.
20. 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.

21. 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.

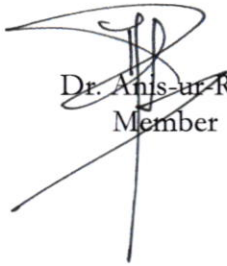
22. What is relevant to the Pakistan Medical Commission as the national regulator of medical practices is what is commonly referred to as "Aesthetic Medicine". Aesthetic medicine is a broad term for specialties that focus on altering cosmetic appearance through the treatment of conditions. It includes 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.

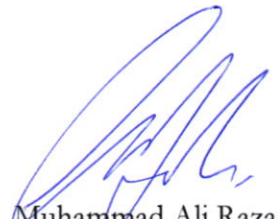
23. It has become abundantly clear that there is an urgent need to determine the scope of Aesthetic Medicine and its credentialing as in the absence of the same it is not possible to enforce the limits of practice on medical practitioners engaged in the practice of aesthetics and cosmetology, as well 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.
24. 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.
25. The Disciplinary Committee has noted that Dr. Nada Hassan submitted compliance report on 26.01.2022 whereby she has undertaken that *"Neither did I ever represented/impersonated as Certified Dermatologist nor will I do so in future unless I get degree for the same"*. She has also submitted a copy of an application addressed to the Director FIA Cyber Crime Cell, Islamabad, wherein she requested to take action against websites/ bloggers for publishing words titles of dermatologist with her name.
26. 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. Nada Hassan, the Committee has decided that no penalty shall be imposed upon Respondent doctor. However, the Committee shows concern about the various treatment offered to patients and using of word "guarantee" with respect to treatment and directs the Respondent to refrain from using such terminologies in future. Further, Dr. Nada Hassan 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