

COMPETITION COMMISSION OF PAKISTAN

ENQUIRY REPORT

(Under the provisions of Section 37(1) of the Competition Act, 2010)

**IN THE MATTER OF ENQUIRY AGAINST MEDICAL
INSTITUTIONS *PRIMA FACIE* ENGAGED IN DECEPTIVE
MARKETING PRACTICES**

BY

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A. BACKGROUND

1. A press release was issued by the Pakistan Medical and Dental Council in the *daily Express Tribune* dated 12th November 2013 (hereinafter referred to as the '**Press Release**'). In Press Release the public at large and in particular the prospective students were cautioned against 22 private medical and dental colleges, which are either not registered with the Pakistan Medical and Dental Council or have failed to meet the registration criteria. Copy of the Press Release is attached as '**Annex-A**'.
2. In the Press Release, it was stated that registration of six colleges had been cancelled temporarily. However, those they would resume the process of admissions once they meet the criteria laid down by the Pakistan Medical and Dental Council. Before cancelling their registration, these six colleges were issued warning letters to overcome the shortcomings, but they failed to comply.
3. Based on the above and the mandate of the Competition Commission of Pakistan (hereinafter the '**Commission**') under the Competition Act, 2010 (hereinafter the '**Act**'), the Commission after conducting the initial probe and the past practices of engineering universities regarding advertising admission, while they were not accredited, deemed it appropriate to conduct an enquiry in the matter. Therefore, pursuant to the provisions of subsection (1) of Section 37 of the Act, the Commission constituted an Enquiry Committee with the direction and mandate to undertake a fact finding enquiry and submit the report by giving their findings and recommendations *inter alia* on the following issue:

Whether the marketing/ advertising practices of medical colleges/ institutes are in prima facie violation of Section 10 (deceptive marketing practices) of the Act?

B. MEDICAL EDUCATION IN GENERAL

4. Before we proceed further, we deemed it appropriate to first give an overview about the importance of medical education and the role played by the medical colleges/ institutes in facilitating the consumers.
5. Medical education is the bedrock on which high-quality healthcare is built. Training is important but education is vital. Of-course, the newly prospective doctors need extensive knowledge and practical skills and that is where training is important. But education during these formative years with a well recognized institution which are following and implementing the higher standard of education and quality assurance is a must, as it will establish the principles that will guide graduated doctors in imparting the healthcare services to the public at large.

I. RECOGNITION CRITERIA OF MEDICAL INSTITUTIONS – THE LEGAL FRAMEWORK

6. Medical colleges must attain recognition by the PMDC. A Comprehensive Feasibility Report is made of the college checking: infrastructure (availability of water, electricity, telephones, building materials, furniture); mandatory facilities (laboratories, dissection hall, library); financial viability to be a self financing non-profit; proposed affiliation of the college to a recognized University of Pakistan; and availability of qualified teachers and staff.¹ Medical Colleges are then subject to inspection every five years to ascertain if they continue to meet PMDC standards.

(a) HIGHER EDUCATION COMMISSION:

7. Higher Education Commission (hereinafter the ‘HEC’) is an independent, autonomous, and constitutionally established institution of primary funding, overseeing, regulating, and accrediting the higher education efforts in Pakistan. HEC was established under the Higher Education Commission Ordinance, 2002 (hereinafter the ‘HEC Ordinance’).
8. Pursuant to the powers provided under clause (o) of subsection (1) of Section 10 of the HEC Ordinance, Equivalence & Accreditation Committee has been established. This committee is entrusted with the responsibility of considering and making decision on the recognition of degrees/diplomas of local universities as well as equivalences of degrees/diplomas awarded by the foreign universities *vis-à-vis* the degrees/diplomas of universities in Pakistan.
9. Pursuant to the provisions of Section 10 of the HEC Ordinance, HEC has issued Guidelines for Establishment of a new university or an institution of higher education (hereinafter the ‘HEC Guidelines’). The HEC Guidelines set out the procedure for establishing a new university or institution of higher education. The first step for establishing a new university or institution for higher education is to fulfill the legal requirements in the case of private universities. Once this has been done, a feasibility report has to be submitted with the Chairman of HEC in accordance with the General Institutional Requirements Proforma (Form PU-01) along with the prescribed fee. HEC will review the feasibility report and may find that further consideration is required by a panel appointed by HEC, which may ask for additional information. However, in the event clearance has been given to the feasibility report, an Inspection Committee will be appointed to conduct a preliminary site visit/ inspection of the institution for physical verification of the infrastructure and facilities of the institution. The institute has to pay HEC the prescribed inspection fee. In case the report submitted by the Inspection Committee to HEC is satisfactory, HEC will review the draft charter and may recommend the case for grant of Charter to the Federal or Provincial Government

¹ See: www.pakistan.gov.pk/divisions/health-division/media/FAQ_PMDC.doc (last accessed October 2008).

as the case may be. Therefore, any new university or institution of higher education being established within Pakistan may obtain approval of HEC for obtaining a charter as HEC advises the Federal and Provincial Government in respect of granting of Charters.

10. Pursuant to the provisions of clause (e) of subsection (1) of Section 10 of the HEC Ordinance, HEC has the power to set up national or regional evaluation councils or authorize any existing council or similar body for the purpose of accreditation of institutes including their departments, faculties and disciplines. Pursuant to section 10 of the HEC Ordinance, there are 9 independent professional councils while 4 other councils have been established by HEC.
11. Pakistan Medical and Dental Council (hereinafter the ‘**PMDC**’) is one of the nine (9) existing independent professional councils that have been authorized by the HEC to carry out the accreditation and recognition of the medical colleges/institutes.

(b). PAKISTAN MEDICAL AND DENTAL COUNCIL:

12. PMDC was initially established on the recommendation of Health Conference held in November 1947 whereby Indian Medical Council Act 1933 was adopted. Thereafter, Re-organized under P.M.C. Act of 1951. Upon formations of the province of West Pakistan, West Pakistan Medical Council was created by merging Sindh & Punjab Medical Councils in 1957. Finally, the PMDC was re-constituted under the Pakistan Medical and Dental Council Ordinance, 1962 (hereinafter the ‘**PMDC Ordinance**’) and the Provincial Medical Councils were dissolved.
13. PMDC is the main medical regulatory body responsible for regulating the country’s medical profession. PMDC is principally mandated to:
 - (a) Setting national standards for medical education;
 - (b) Keeping a register of medical practitioners;
 - (c) Accrediting medical colleges keeping in view the quality of facilities, numbers of teachers and other terms and conditions as provided under the PMDC Ordinance and the Rules and Regulations made thereunder.
14. It is pertinent to mention here that in terms of the Section 3 of the Medical and Dental Degrees Ordinance, 1982 (hereinafter the ‘**MD Ordinance**’), only the institutions notified in the schedule of the MD Ordinance or such other institutions the Federal Government are authorized in Pakistan to confer, grant or issue degrees, diplomas, licences, certificates, or other documents stating or implying that the holder, grantee or recipient thereof is qualified to practice scientific Medical and Dental System

15. Pursuant to the provisions of Section 33 of the PMDC Ordinance, the PMDC has formulated and promulgated the Medical and Dental Institutions (Recognition, Eligibility Criteria for Enhancement in Annual Admissions and Accreditation Standards) Regulations, 2012 (hereinafter the '**Recognition Regulations**').
 16. Pursuant to the provisions of Regulation 3 of the Recognition Regulations, any college/ Institution who is desirous of recognition and establishment of Medical or Dental College/ Institution shall make an application to the Federal Government on a prescribed form, as per the appendix-I of the Recognition Regulations.
- 16-A- PMDC in its 97th Session held on 29th and 30th December 2001 has laid down criteria for establishment/recognition of medical and dental college in Pakistan², which is detailed below:
- (i). An application form as prescribed under Regulation 3 of the Recognition Regulations, along with a comprehensive Feasibility Report shall be submitted, with the following information:
 - (a) Space: The application must include all the relevant documents of ownership, possession, and plan of academic blocks. Site selected should be suitable from academic point of view. Minimum requirement for total area of Medical/Dental Institution must be in accordance with the area as prescribed by PMDC from time to time.
 - (b) Infrastructure: Adequate physical facilities for Academic Blocks, dissection Halls, common rooms, cafeteria, medical/dental equipment related to laboratories, libraries, various models, Information Technology etc. must be created for by the intending institute.
 - (c) Financial Resources: Every intending college must be financially viable. Financial resources should be clearly indicated according to level, size, and type of the proposed institution. It should be able not only to establish but also to run progressive medical/dental college.
 - (d) Legal Requirement: The institute should fulfill all legal formalities, as may be prescribed by PMDC under the Recognition Regulations from time to time.
 - (e) Organizational Structure/Faculty: Faculty should be employed full time and qualified as per regulation for appointment laid down by PMDC. CVs of every faculty member/all members of administration/staff should be submitted to PMDC for scrutiny, along with terms of reference (TOR) for employment. Qualifications

² <http://www.pmdc.org.pk/Guidelines/Criteriaformedicaldentalcolleges/tabid/121/Default.aspx>

registered with PMDC, recognized teaching experience of faculty members especially for teaching and examinations purposes. Date of joining the college, designation, whether PMDC approved or not, details of research publications etc. List of qualified Para-medical staff & Ancillary staff must be included as per requirement.

- (f) Transport Facilities: Adequate transport facilities for students, teachers, staff etc. must be available keeping in mind locality of institutions, number of students and other logistics.
- (g) Library: Library should be well equipped with sufficient number of books, latest editions of reference books/journals, computers with internet facilities..
- (h) Attached Teaching Hospitals: Hospital should be well equipped and must be functional at the time of first inspection of the College. Criteria of 5 beds per annual admission can be lowered to 3 beds per annual admission in the first year of establishment. At least 50% of the beds should be absolutely free of charge. For the remaining 50% of paid beds, a written document should be available for allowing the undergraduates for examination for learning purpose. The teaching hospital must be well-reputed and all major disciplines along with well-equipped operation theatres and support services should be fully available. In case of dental institutes at least half (0.5) dental chairs per admission should be available at the time of first inspection. The attached hospitals should also provide emergency treatments with all standard hospital requirements and should have modern diagnostic facilities with close circuit T.V. for educational purposes. Department of medical education and Physiotherapy should also be included as part of hospital/college.
- (i) Affiliation with a University: The Medical/Dental College must only be affiliated with a University of the same province, which has a medical/dental faculty.
- (ii). Scrutiny Of Applications: Before undertaking the first inspection, the application for recognition must be submitted on a prescribed Performa with the details mentioned in the Performa. The application is required to be submitted to the PMDC along with the prescribed processing fee i.e. Rs.100,000/-. The application will be scrutinized according to the laid down criteria. The Secretary, PMDC will ensure identification of the deficiencies or otherwise for approval by the Executive Committee. If no deficiencies are found, then the PMDC may approve to appoint an inspection team.

All institutions, trying to get themselves established and wanted to or have advertised in the press for admission of the medical students, should be informed that they should submit application for inspection before establishment of the College.

In case they have failed to submit the application before the advertisement time then it should be mandatory that the newly established college must apply PMDC to carry out inspection before conduct of the first professional examination (This is only applicable to those colleges who had established before the new criteria was published).

- (iii). Depending on the report submitted on initial scrutiny of the application, the Executive Committee may arrive at the following decisions:
 - (a) Removing the Deficiencies, if any: The institution may be informed of the deficiencies detected on scrutiny, and asked to resubmit the request after removing the deficiencies for inspection. It is mandatory that revised application be submitted before conducting the first professional examination, failing which the PMDC will not be under any obligation to conduct inspection at later stages. The scrutiny team must ensure that the requirements laid down are duly approved by the Executive Committee and are available in the institution.
 - (b) Inspection Team: The inspection team must comprise 5-7 members, consisting of two senior professors from Basic Medical Sciences and five from Medicine, Surgery, Obstetrics & Gynecology, Ophthalmology, Pediatrics and Otorhinolaryngology. The inspection team will be accompanied by the Secretary PMDC or one of his representatives.
 - (c) Inspection Schedule: Inspection of all relevant departments should be done for concerned year of training as per the schedule prescribed. The objectives for each visit are mentioned below and the details are present in the forms.
- (iv.) Every Individual/Institution intending to establish a medical/dental college must apply for an inspection to the PMDC prior to advertisement for applications of admission in First Year class. The advertisement can only be issued after No Objection Certificate is obtained from PMDC. NOC will only be issued after going through the complete feasibility report and 1st Inspection.
 - (a) **Visit 1; 1st Comprehensive Inspection Prior to the first admission of students**: The inspection team would look into the following in addition to the criteria already given.

- Suitability of the venue for educational purposes: Availability of all necessary infrastructure and physical facilities needed during the first professional.
 - Presence of needed educational resources:
 - Recruitment of appropriate and adequate teaching faculty.
 - Availability of written curriculum,
 - Adequacy and source of funds,
 - Procedure for financial accountability.
 - Permission to intake admissions: It is pertinent to mention here that that subsequent to the first inspection, if no shortcomings are found by the Inspection Committee, then the proposed Medical College is allowed to intake admission of the students by advertising.
- (b) **Visit 2; At the time of first professional examination:** The inspection team would observe
- The conduct of examination.
 - Availability of appropriate and adequate numbers of examiners.
 - Relevance of assessment to the objectives of training for the year.
 - And report on the transparency and fairness of the examination.
- (c) **Visit 3. Beginning of the 3rd year or second professional:** The inspection team would look into the;
- Availability of all necessary infrastructure and physical facilities needed during the second professional in the medical college as well as affiliated teaching hospital.
 - Adequacy of clinical training opportunities including workload, case mix on the hospitals.
 - Availability of required clinical faculty.
 - Presence of needed educational resources.
 - Recruitment of appropriate and adequate teaching faculty.
 - Availability of written training program with objectives, syllabus, teaching methods and assessment program.
- (d) **Visit 4. At the time of second professional examination:** The inspection team would observe
- The conduct of examination.

- Availability of appropriate and adequate numbers of examiners.
- Relevance of assessment to the objectives of training for the year.
- And report on the transparency and fairness of the examination

(e) **Visit 5. 2nd Comprehensive Inspection beginning of the 4th year or third professional**: The inspection team would look into the:

- Availability of all necessary infrastructure and physical facilities needed during the third professional in the medical college as well as affiliated teaching hospital.
- Adequacy of clinical training opportunities including workload, case mix.
- Availability of required clinical faculty.
- Presence of needed educational resources.
- Recruitment of appropriate and adequate teaching faculty.
- Availability of written training program with objectives, syllabus, teaching methods and assessment program.

(f) **Visit 6. At the time of third professional examination**: The inspection team would observe

- The conduct of examination.
- Availability of appropriate and adequate numbers of examiners.
- Relevance of assessment to the objectives of training for the year.
- And report on the transparency and fairness of the examination

(g) **Visit 7. At the time of fourth professional examination**: The inspection team would observe

- The conduct of examination.
- Availability of appropriate and adequate numbers of examiners.
- Relevance of assessment to the objectives of training for the year.
- And report on the transparency and fairness of the examination.

- (v). In addition to the above stages the Council shall also conduct surprise inspections of the colleges. The Medical /Dental College which are fully recognized by the Council are inspected after every five year to ensure that the standard on which the college was granted full recognition is maintained.

II. STATISTICS ABOUT RATIO OF DOCTORS PER 1000 PATIENTS

17. In Europe there are 3.5 doctors for every 1,000 patients, and according to the World Health Organization, the third world countries had 1.3 doctors against 1,000 patients. In Pakistan, the ratio is 0.7 doctors against 1,000 patients. There are 165307 doctors in Pakistan, of which 5,004 are in Baluchistan, 3,079 in the AJK, 19,792 in the NWFP, 64,975 in Sindh and 68,790 in Punjab while 3,101 doctors are foreign degree holders. During the year 2012-13 PMDC has reallocated the seats to its approved colleges and now there are approx. 14,150 seats for MBBS and BDS.³
18. The number of doctors registered in Pakistan at present is about 110,000. It is estimated that about 25000 Pakistani doctors are working abroad. Leaving 85000 for a population of about 150 millions making a ratio of one doctor for 1764 persons. The doctor population ratio/recommended for developing countries like Pakistan by W.H.O is 1 doctor for 1,000 populations. At this ratio the requirement of doctors in Pakistan for 150 million population is 150000 doctors. This shows that we require another about 65, 000 doctors in the country to fulfill our own needs. A shortage which appears very difficult for the public sector medical colleges to overcome.

III. STATISTICS ABOUT ADMISSIONS IN MEDICAL COLLEGES PER YEAR IN PAKISTAN

19. In Pakistan, every year, about 30,000 students, pass F.Sc. premedical examination in First Division, securing over 60% marks and apply to get admission in medical colleges. About 4000 get admission in public sector medical colleges and the remaining about 26,000 do not succeed though they are very keen to join this profession and serve the ailing humanity.
20. Keeping in view the above, it must be born in mind that the institutions imparting medical education are not only duly recognized and accredited by the PMDC as per the standards set by it but also has quality of facilities and best teaching standards in order to ensure that the students are well equipped with the required expertise to provide high-quality healthcare services.
21. Furthermore, the institutions offering and advertising programs in medicine and dentistry that have no permission to advertise/offer or admits students, are capable of taking advantage of the ignorance of general public/perspective student and create unfavorable competition for institutions that have obtained recognition and accreditation by PMDC. In addition, such institutions also robs the consumers (students) of their viable future, as despite of spending too much money and years of study a degree which is not recognized is of no value to them. It is with the

³ Source: Pakistan Medical and Dental Council

above importance of the medical education and the news paper report regarding certain Medical Colleges/ Institutions whose recognitions has either been suspended or they have been retrained not to intake any admissions for the year 2013-2014, the Commission deemed it appropriate to initiate enquiry in the instant matter.

C. METHOD OF RESEARCH BY THE ENQUIRY OFFICERS

22. In this enquiry various methods have been adopted to collect the information regarding the medical sector, in particular, the medical educational sector. The methods adopted for the conduct of enquiry and gathering of evidence / facts are as follows:

I. PRIMARY RESEARCH / EVIDENCE GATHERING METHODS

23. In order to understand the whole procedure of approval from PMDC and to confirm the list of institutes restricted for admissions during 2013-14, the enquiry officers wrote a letter to Registrar PMDC, requesting him to conduct a meeting with them. Later the enquiry officers visited the head office of PMDC Islamabad and conducted a meeting with the Deputy Registrar PMDC.
24. In order to further verify the research made by the enquiry officers, telephonic calls have been made to all the Medical Colleges/ Institutes either recognized or not recognized by PMDC or recognized but restricted to take admissions during 2013-14. The calls made to the admissions enquiry offices of institutes were properly recorded. They were asked to clarify their current recognition status with PMDC and whether they took admissions for the session 2013-14 or not.

II. SECONDARY RESEARCH / EVIDENCE GATHERING METHODS

25. The enquiry officers have also conducted the desk research by searching the newspapers and online resources regarding the admission advertisements for 2013-14 from the websites of all the institutes pointing out by PMDC under the head not recognized or restricted to admission during 2013-14. The admission advertisements were also searched online on different newspapers. If the institute has a website and it claims to be recognized/ affiliated/ accredited from PMDC, same fact has been noted and it was further compared with the status of the institute as provided by PMDC.

D. DOCUMENTS, MATERIALS AND ESSENTIAL FACTS

26. Based on the research and the documents gathered during the research and evidence gathering phase, in this enquiry the Medical Institutions have been divided predominantly in three categories:
- (a) Medical College/ Institutes recognized by PMDC;
 - (b) Medical Colleges / Institutes not recognized by PMDC;
 - (c) Medical Colleges/ Institutes, though recognized by PMDC but not allowed to intake the admissions during the year 2013-2014;

(a) MEDICAL COLLEGES/ INSTITUTES RECOGNIZED BY PMDC

27. Since, the Medical Colleges/ Institutes falling under this category are duly recognized by PMDC, therefore, they do not fall within the purview of this enquiry. The list of the institutes notified by PMDC and recognized is attached as 'Annex-B'.

(b) MEDICAL COLLEGES/ INSTITUTES NOT RECOGNIZED BY PMDC

28. The Medical Colleges/ Institutes falling under this category are those which have not fulfilled the recognition criteria laid down by the PMDC under the Recognition Regulations read with the PMDC Ordinance and the MD Ordinance and thus have not been recognized. These Medical Colleges/ Institutes are as follows:
- (i). Sahiwal Medical College, Sahiwal;
 - (ii). Hashmat Medical College, Gujrat;
 - (iii). Al-Razi Medical College, Peshawar;
 - (iv). Northern Institute of Medical Sciences (NIMS), Abbottabad⁴.
29. In addition to the criteria mentioned in paragraphs 12 to 17 above, it is pertinent to mention here that the August Supreme Court of Pakistan in its judgment reported as 'PLD 2007 SC 323' in para 27(i) thereof has held that no institution can train a medical student unless their institute is recognized/notified by the Federal Government. The relevant passage from the aforesaid judgment is as follows:

"27(i) no medical institution or university can train or grant a medical or dental qualification or train and grant both unless the said qualification, degree or diploma has been accorded

⁴ Closed by the Hon 'able Peshawar High Court, Abbottabad Bench vide Judgment

recognition in terms of Section 11 of the Pakistan Medical & Dental Council Ordinance, 1962."

30. The institutions mentioned in Para 28 above have been directed not to admit or advertise for admission of students unless their institutions are notified by the Federal Government under PMDC Ordinance, as any such action shall be construed to be a violation of the PMDC Ordinance, Medical & Dental (Amendments) Act, 2012 and orders of the Honourable Supreme Court of Pakistan.
31. It is also worth mentioning that if any student is admitted before issuance of notification by the Federal Government, responsibility of any adverse effect on the career of the students shall be entirely on the admitting authorities and penal action shall be taken against the institute under Section 25 of Medical & Dental (Amendments) Act, 2012 which amended the section 22 of PMDC Ordinance.
32. Despite of best efforts, the undersigned enquiry officers were unable to find the websites of the Medical Colleges/ Institutes mentioned in Para 28 above. No other information regarding their admission advertisements for 2013-14 have been found. However, in the case of Hashmat Medical & Dental College Gujrat, the website of the institute is available which discloses that the institute is recognized by PMDC. The name of the college is also in the list of Colleges where PMDC has directed to stop admissions for the year 2013-14, discussed below in detail.

(c) MEDICAL COLLEGES/ INSTITUTES THOUGH RECOGNIZED BY PMDC BUT NOT ALLOWED TO INTAKE ADMISSION FOR THE YEAR 2013-2014

33. The Medical Colleges/ Institutes falling under this category are those which have not fulfilled the recognition criteria laid down by the PMDC under the Recognition Regulations read with the PMDC Ordinance and the MD Ordinance and have been issued warning letters to comply with the requisite standards. Unless the requisite criterion is met, PMDC has laid a restriction on the intake of admissions by these Medical Colleges/ Institutes for the year 2013-2014. The list of these Medical Colleges/ Institutes, is as follows:
 - (i). Pak Red Crescent Medical & Dental College, Lahore.
 - (ii). Mohiuddin Islamic Medical College, Mirpur(AJK).
 - (iii). Abbottabad International Medical College, Abbottabad.
 - (iv). Independent Medical College, Faisalabad.
 - (v). Women Medical College, Abbottabad.
 - (vi). Hashmat Medical & Dental College, Gujrat.
 - (vii). Al-Razi Medical College, Peshawar.
 - (viii). Sahiwal Medical College, Sahiwal.
 - (ix). Muhammad Bin Qasim Dental & Medical College, Karachi.(BDS)
 - (x). Bhattai Medical & Dental College, Mirpurkhas Sindh. (BDS)

- (xi). Federal Medical & Dental College, Islamabad.
 - (xii). Mohtarma Benazir Bhutto Shaheed Medical College, Mirpur-AJ&K.
 - (xiii). AJ&K Medical College, Muzaffarabad-AJ&K.
34. It is important here to recall the research methodology used by the enquiry officers in case of each institute, as the facts are placed accordingly:
- (i). Searching the websites of the institute for general information.
 - (ii). If the institute has a website and it claims to be recognized/ affiliated/ accredited from PMDC, same fact has been disclosed and it is further compared with the status of the institute as provided by PMDC.
 - (iii). Any advertisement provided on the website of the institute regarding the admissions for the year 2013-14 has been notified.
 - (iv). Advertisements for admissions during 2013-14 in newspapers or any other website were also searched.
 - (v). Telephonic enquiry has also been made in case of all the institutes to clarify about the admission during 2013-14.
35. Based on the above methodology, the case of every Medical College/ Institute as mentioned in Para 33 above is discussed in the following paragraphs:
- (i). **PAK RED CRESCENT MEDICAL & DENTAL COLLEGE, LAHORE:**
36. Pak Red Crescent Medical and Dental College Lahore (hereinafter the ‘**PRC M&D College**’) was established in the year 2011. It is located in PRCS Medical Complex at Dina Nath in rural settings. It consists of many departments including Anatomy, Biochemistry, Behavioral Sciences, Surgery, medicine etc.
37. The website of PRC M&D College under the head affiliation has shown that it is approved by the Ministry of Health, Government of Pakistan and is Recognized & Registered by PMDC (**Annex-B1**). Whereas PMDC has restricted them to take the admissions during 2013-14⁵ (**Annex-B2**). However, the website of the College contains information about the new admissions in MBBS class part-I 2014 under the head News (**Annex-B3**).
38. A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They declared that the institute has some issues regarding the recognition from PMDC. However, they took admissions for the session 2013-14.
- (ii). **MOHI-UD-DIN ISLAMIC MEDICAL COLLEGE, MIRPUR (AJK):**
39. Mohi-ud-Din Islamic Medical College, Mirpur (hereinafter referred to as the ‘**MIMC**’) is the medical institution in AJK, established by Hazrat Allama Pir Ala-ud-Din Siddiqui, Chancellor Mohi-ud-din Islamic University, Nerian Sharif, AJK.

⁵ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_pak_red.pdf

The College is located at sector D-4, new Industrial area, Mirpur, AJK, having covered area of 3.5 million square feet. It consists of many departments including Anatomy, Biochemistry, Physiology, Pathology and community medicine etc.

40. The website of the college under the head accreditation shows that it is recognized by PMDC vide Notification No. PF.12-F-2009 (mohiuddin) 128652 dated 19th June, 2009 and accreditation is published in the Part-V of the Gazette of Pakistan dated 9th of June, 2009 (**Annex-C1**). Whereas, PM&DC has restricted them to take the admissions during 2013-14⁶ (**Annex-C2**).
41. The website of the College contained information about the 1st & 2nd merit list of 2013- 2014 admissions under the head News updates. The lists were also provided along with the link (**Annex-C3**).
42. A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They admitted that the institute has some issues regarding the recognition from PM&DC. However, they took admissions for the session 2013-14.

(iii). **ABBOTTABAD INTERNATIONAL MEDICAL COLLEGE, ABBOTTABAD:**

43. The website of the College under the head affiliations has revealed that the Abbottabad International Medical College, Abbottabad (hereinafter the 'AIMCA') is recognized by the Ministry of Health Government of Pakistan and PMDC (**Annex-D1**). Whereas, PMDC has restricted them to take the admissions during 2013-14⁷. (**Annex-D2**)
44. The website only contains information about the admission openings during 2012. A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They clarified that the institute has been recognition by PMDC and they took admissions for the session 2013-14.

(vi). **INDEPENDENT MEDICAL COLLEGE, FAISALABAD:**

45. Independent Medical College, Faisalabad (the 'IMC Faisalabad') was established in 2000. Independent University Hospital (**IUH**) is the teaching hospital of IMC Faisalabad. It is 550 bedded general hospital. The website of the College shows that it is affiliated with University of Health Sciences, Lahore, Pakistan and with College of Physician & Surgeon, Pakistan. It also revealed that the college is recognized by PMDC, under section 11 of PMDC Ordinance (**Annex-E1**). Whereas, PMDC has restricted them to take the admissions during 2013-14⁸ (**Annex-E2**).

⁶ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_mohiuddin.pdf

⁷ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_AIMC_abtt.pdf

⁸ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_IMC_FSD.pdf

46. The website of IMC Faisalabad only contains information about the admission openings during 2012. A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They clarified that the institute has been recognition by PMDC and they took admissions for the session 2013-14.
47. The website doesn't contain any information about the admission openings during 2013-14. But the telephonic enquiry reveals that they took admissions during 2013-14.

(v). **WOMEN MEDICAL COLLEGE ABBOTTABAD:**

48. Women Medical College Abbottabad, is situated in Abbottabad, (hereinafter the 'WMC Abbottabad') about 05 km from the heart of the city on Murree Road, Nawanshehr. The college is housed in a historic building commonly known in the city as "HOTI PALACE" which is spread over an area of 50 kanals of land. Almost 60% of the area is covered by the campus building i.e. old and new and the rest 40% comprises of lush green lawns and playgrounds. The college started its classes in 2000. It has MBBS and BDS departments.
49. The website of the college revealed that it is recognized by PMDC (**Annex-F1**). Whereas, PMDC has restricted them to take the admissions during 2013-14⁹ (**Annex-F2**).
50. The admission advertisement for the admissions of 2013 is given on the website of the College (**Annex-F3**). A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They admitted that the institute has some issues regarding the recognition from PMDC. However, they took admissions for the session 2013-14.

(vi). **HASHMAT MEDICAL AND DENTAL COLLEGE GUJRAT:**

51. Hashmat Medical and Dental College Gujrat (hereinafter the 'HMD College') was established in 2011. The college is running various departments like Anatomy, Biochemistry, Physiology, Community Medicine etc.
52. The website of the college revealed that it is recognized by PMDC and affiliated with UCH Lahore (**Annex-G1**). Whereas, PMDC has restricted them to take the admissions during 2013-14¹⁰ (**Annex-G2**).
53. The website of the college doesn't include any information regarding the admissions during 2013-14. A telephonic enquiry has been made by the enquiry officers from the admissions enquiry section. They admitted that the institute has

⁹ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_wmc_abtt.pdf

¹⁰ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_hashmat.pdf

some issue regarding the recognition from PMDC and due to this reason they didn't take any admissions for the session 2013-14.

54. It is pertinent to mention here that the name of the institute is also in the list of not recognized institutes by PMDC.

(vii). AL RAZI MEDICAL COLLEGE PESHAWAR:

55. There is no website available for Al Razi Medical College Peshawar (hereinafter the '**ARM College**'). The enquiry officers were unable to find the advertisements for admission information during 2013-14. The telephone numbers of the college were also not working. PMDC has restricted them to take the admissions during 2013-14¹¹ (**Annex-H**). Their name is also in the list of not recognized institutes by PMDC.

(viii). SAHIWAL MEDICAL COLLEGE SAHIWAL:

56. There is no website available for Sahiwal Medical College Sahiwal (hereinafter the '**SM College**'). However, the list of candidates selected on open merit seats for 2013-14 for SM College has been available on the website of University of Health Sciences Lahore (UCH) (**Annex-I1**). Whereas, PMDC has restricted them to take admissions during 2013-14¹² (**Annex-I2**). Upon telephonic enquiry the admissions enquiry section refused to reply on any of the questions asked by the enquiry officers. They insisted to call UCH for further details. Their name is also in the list of not recognized institutes by PMDC.

(ix). MUHAMMAD BIN QASIM DENTAL AND MEDICAL COLLEGE KARACHI:

57. There is no website available for Muhammad Bin Qasim Dental and Medical College Karachi (hereinafter the '**MBQ Dental and Medical College**'). No other information regarding the admission advertisements for 2013-14 has been found for this college. PMDC has restricted them to take admissions during 2013-14¹³ (**Annex-J**). The telephone numbers of the institute were not working so the enquiry officers were not able to find any material fact regarding their admissions during 2013-14.

(x). BHITAI MEDICAL & DENTAL COLLEGE MIRPURKHAS SINDH:

58. Bhitai Dental & Medical College (hereinafter the '**BMD College**') was formed under the umbrella of Bhitai Trust. Bhitai Trust is currently operating a 50 bedded general hospital in Mirpurkhas city at Umerkot Road. Present building of college is built on 2 acres of land having covered area of 25000sq. feet at Mirpurkhas city

¹¹ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_al-razi.pdf

¹² http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_sahiwal.pdf

¹³ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_bin_qasim.pdf

in peaceful place and houses the entire basic requirement at college campus. Starting from BDS course, Trust also aims to establish MBBS, Postgraduate Medical Education, its allied sciences & other educational programs in near future.

59. The website revealed that the College is recognized by PMDC and affiliated with the Liaquat University of Medical & Health Sciences (LUMHS), Jamshoro (**Annex-K1**). However, it doesn't disclose any information regarding the admissions opening for the session 2013-14. It is pertinent to mention that PMDC has restricted them to take the admissions during 2013-14¹⁴ (**Annex-K2**).
60. The telephone numbers of the institute were not working so the enquiry officers were not been able to find any other information regarding their admissions during 2013-14.

(xi). **FEDERAL MEDICAL & DENTAL COLLEGE ISLAMABAD:**

61. There was no website available for Federal Medical & Dental College Islamabad (hereinafter the 'FMD College'). However, there admission advertisement for 2013-2014 has been available on the following link (**Annex-L1**): http://www.eduvision.edu.pk/edu_news/news.php?action=fullnews&showcomments=1&id=1972.
62. PMDC has restricted them to take the admissions during 2013-14¹⁵ (**Annex-L2**). The telephone numbers of the institute were also not working.

(xii). **MOHTARMA BENAZIR BHUTTO SHAHEED MEDICAL COLLEGE MIRPUR-AJ&K:**

63. Mohtarma Benazir Butto Shaheed Medical College (hereinafter the 'MBBS Medical College') has no website. No other admission advertisement for the year 2013-14 has been found. PMDC has restricted them to take the admissions during 2013-14¹⁶. The telephone numbers of the institute were also not working.

(xiii). **AZAD JAMMU & KASHMIR MEDICAL COLLEGE, MUZAFFARABAD-AJ&K:**

64. Azad Jammu and Kashmir Medical College (hereinafter the 'AJ&K Medical College') was commissioned in October 2012 and affiliated with the University of Azad Jammu and Kashmir. Currently it enrolls 100 students per year. The admission is based on strict merit in accordance with PMDC rules and regulations. The College has basic health & clinical health departments.

¹⁴ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_bhittai.pdf

¹⁵ http://www.pmdc.org.pk/Portals/0/Annoc/surp_insp_federal.pdf

¹⁶ <http://www.pmdc.org.pk/STOPADMISSION/tabid/362/Default.aspx>

65. The website of the College revealed that it is a PMDC recognized public sector medical college (**Annex-M1**). Whereas, PMDC has restricted them to take admissions during 2013-14¹⁷ (**Annex-M2**).
66. There is no other information available on the website for the admissions during 2013-14. The telephone numbers of the institute were not working.

E. ANALYSIS & CONCLUSION

67. Based on the information available on record and the submissions made before us, we the undersigned enquiry officers have reached the following conclusions:
68. Pursuant to the paragraphs 21 to 23 above of this report, that in Pakistan, the ratio is 0.7 doctors against 1,000 patients; however, the recommended ratio by the World Health Organization is 1 doctor per 1000 patients. Moreover, in Pakistan, every year, about 30,000 students pass F.Sc premedical examination in First Division, securing over 60% marks and apply to get admission in medical colleges. About 4000 get admission in public sector medical colleges and the remaining about 26,000 do not succeed though they are very keen to join this profession and serve the ailing humanity. Since, a larger chunk of the students who study pre-medical in the F.Sc do not get admissions in the public sector universities, therefore, a large number of students due to their urge in getting the medical degree resort to the private medical colleges/ institutions.
69. Medical education is the bedrock on which high-quality healthcare is built. Training is important but education is vital. Therefore, every Medical & Dental College/ Institution intending to establish a medical/dental college must apply for an inspection to the PMDC prior to advertisement for applications of admission in First Year classes. The advertisement can only be issued after obtaining No Objection Certificate from PMDC. NOC will only be issued after going through the complete feasibility report and 1st Inspection.
70. In the case of PRC M&D College, we conclude that in terms of Para 36 to 38 of this reports, it appears that although the said Medical College/ Institute was recognized initially; however, due to not fulfilling few mandatory conditions, PMDC has restrained PRC M&D College to intake admissions for the year 2013-2014. However, from the material made available it appears that the said Medical and Dental College has intake admission in the year 2013-2014 purportedly claiming to be recognized to intake admission and have not mentioned the qualifier regarding the restriction imposed by PMDC on their website
71. In the case of Mohi-ud-Din Islamic Medical College, we conclude that in terms of Para 39 to 42 of this Report, it appears that although the said Medical College/ Institute was recognized initially; however, due to not fulfilling few mandatory

¹⁷ <http://www.pmdc.org.pk/STOPADMISSION/tabid/362/Default.aspx>

- conditions, PMDC has restrained the said College to intake admissions for the year 2013-2014. However, from the material made available it appears that the said Medical and Dental College has intake admission in the year 2013-2014 purportedly claiming to be recognized to intake admission and have not mentioned the qualifier regarding the restriction imposed by PMDC on their website.
72. In the case of AIMC, we conclude that in terms of Para 43 & 44 of this reports, it appears that although the said Medical College/ Institute was recognized initially; however, due to not fulfilling few mandatory conditions, PMDC has restrained the College to intake admissions for the year 2013-2014. From the material made available it appears that the said Medical and Dental College has intake admission in the year 2013-2014 purportedly claiming to be recognized to intake admission, *prima facie* in violation of the restriction imposed by PMDC and without mentioning any qualifier to this effect.
73. In the case of IMC Faisalabad, we conclude that in terms of Para 45 to 47 of this reports, it appears that although the said Medical College/ Institute was recognized initially; however, due to not fulfilling few mandatory conditions, PMDC has restrained the College to intake admissions for the year 2013-2014. However, from the material made available it appears that the said Medical and Dental College has intake admission in the year 2013-2014 purportedly claiming to be recognized to intake admission, *prima facie* in violation of the restriction imposed by PMDC and without mentioning any qualifier to this effect.
74. In the case of WMC, we note conclude that in terms of Para 48 to 50 of this reports, it appears that although the said Medical College/ Institute was recognized initially; however, due to not fulfilling few mandatory conditions, PMDC has restrained the College to intake admissions for the year 2013-2014. However, from the material made available it appears that the said Medical and Dental College has intake admission in the year 2013-2014 purportedly claiming to be recognized to intake admission, *prima facie* in violation of the restriction imposed by PMDC and without mentioning any qualifier to this effect.
75. In the case of HMD College, we conclude that in terms of Para 51 to 54 of this report, it appears that the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014, however, they have claimed on their website that they are recognized by PMDC, without qualifier.
76. In the case of ARM College, we conclude that in terms of Para 55 of this Report the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014.
77. In the case of SMC College, we conclude that in terms of Para 56 of this Report, it appears that the said college selected the candidates through open merit, which list is available on the website of University of Health Sciences Lahore.

78. In the case of MBQ Medical College, we conclude that in terms of Para 57 of this Report the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014.
79. In the case of BMD Medical College, we conclude that in terms of Para 58 to 60 of this Report, it appears that the said college has not advertised or intake the admissions for the year 2013-2014 as no such material was made available to the enquiry officers in this regard. However, it appears that the said medical college is not giving any qualifier on its website that they cannot intake admissions for the year 2013-2014 due to the restrictions imposed by the PMDC.
80. In the case of FMD College, we conclude that in terms of Para 61 & 62 of this Report the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014.
81. In the case of MBBS Medical College, we conclude that in terms of Para 63 of this Report the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014.
82. In the case of AJ&K Medical College, we conclude that in terms of Para 64 to 66 of this Report the said Medical College/ Institute is not recognized and they have not taken admission for the year 2013-2014. However, it appears that the said medical college is not giving any qualifier on its website that they cannot intake admissions for the year 2013-2014 due to the restrictions imposed by the PMDC.

F. RECOMMENDATION

83. As it is mentioned in Paragraphs 17 & 18 above of this report, that in Pakistan, the ratio is 0.7 doctors against 1,000 patients; however, the recommended ratio by the World Health Organization is 1 doctor per 1000 patients. Moreover, in Pakistan, every year, about 30,000 students, pass F.Sc. premedical examination in First Division, securing over 60% marks and apply to get admission in medical colleges. About 4000 get admission in public sector medical colleges and the remaining about 26,000 do not succeed though they are very keen to join this profession and serve the ailing humanity.
84. Keeping in view the above and the fact that medical education is the bedrock on which high-quality healthcare is built. Therefore, every Medical & Dental College/ Institution intending to establish a medical/dental college must apply for an inspection to the PMDC prior to advertisement for applications of admission in First Year class. The advertisement can only be issued after No Objection Certificate is obtained from PMDC. Whereas, NOC for taking admission can only be obtained after going through the complete feasibility report and 1st Inspection by PMDC.

85. The deceptive marketing practices have a direct impact on the public at large. It is in the interest of the general public that the undertakings should be stopped to advertise their Products / Services in an unfair and misleading manner and be encouraged to resort to the advertising practices which are transparent and gives consumers/customers true and correct information. Therefore, it is recommended that in the interest of the public at large proceedings may be initiated against PRC M&D College, Mohi-ud-Din Islamic Medical College, AIMCA, IMC Faisalabad, WMC Abbottabad, HMD College, SMC College BMD College & AJ&K Medical College under provisions of Section 30 of the Act for *prima facie* violation of Section 10 of the Act, in accordance with law.

Noman Laiq
Joint Director
Enquiry Officer

Marryum Pervaiz
Deputy Director
Enquiry Officer