

香港醫務委員會
The Medical Council of Hong Kong

DISCIPLINARY INQUIRY
MEDICAL REGISTRATION ORDINANCE, CAP. 161

Dates of hearing: 30 November 2012 (Day 1), 2 January 2013 (Day 2)

Defendant: Dr YAM Michael Chun Hung (任鎮雄醫生) (Reg. No. M08044)

1. This is a consolidated inquiry of 4 cases against the Defendant, Dr YAM Michael Chun Hung. The charges against the Defendant are that:-

First Complaint

“Between September 2008 and June 2009, he, being a registered medical practitioner,

- (1) In respect of an advertisement published in the 2 September 2008 issue of the magazine MORE supplement to the magazine 東方新地, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:
 - (a) the following information in the said advertisement which promoted the services provided by “I-Sky Beauty” with which he had a financial and/or professional relationship,
 - (i) his name, title, and photograph,
 - (ii) the fees in relation to the Velashape body slimming treatment at a discount rate,
 - (b) the statements concerning the nature and/or effects of the Velashape body slimming treatment which are misleading, exaggerating and/or claiming superiority over others.
- (2) In respect of an advertisement published in the 16 September 2008 issue of the magazine MORE supplement to the magazine 東方新地, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:

- (a) the following information in the said advertisement which promoted the services provided by “I-Sky Beauty” with which he had a financial and/or professional relationship,
 - (i) his name, title, and photograph,
 - (ii) the fees in relation to the Gentle Lase laser treatment at a discount rate,
 - (b) the statements concerning the nature and/or effects of the Gentle Lase laser treatment which are misleading, exaggerating and/or claiming superiority over others.
- (3) In respect of an advertisement published in the 23 September 2008 issue of the magazine MORE supplement to the magazine 東方新地, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:
- (a) the following information in the said advertisement which promoted the services provided by “I-Sky Beauty” with which he had a financial and/or professional relationship,
 - (i) his name, title, and photograph,
 - (ii) the fees in relation to the Gentle Lase laser treatment at a discount rate,
 - (b) the statements concerning the nature and/or effects of the Gentle Lase laser treatment which are misleading, exaggerating and/or claiming superiority over others.
- (4) In respect of an advertisement published in the 16 December 2008 issue of the magazine MORE supplement to the magazine 東方新地, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:
- (a) the following information in the said advertisement which promoted the services provided by “I-Sky Beauty” with which he had a financial and/or professional relationship,
 - (i) his name, title, and photograph,
 - (ii) the fees in relation to the Elite Plus treatment,

- (b) the statements concerning the nature and/or effects of the Elite Plus treatment which are misleading, exaggerating and/or claiming superiority over others.
- (5) In respect of the website of www.iskybeauty.com appearing on 18 June 2009, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:
- (a) his name, title and photograph in the said website which promoted the services provided by “I-Sky Beauty” with which he had a financial and/or professional relationship,
 - (b) the promotional statements which have the effect of claiming superiority and/or uniqueness in respect of the equipment used and the services provided by “I-Sky Beauty”,
 - (c) the promotional statements to the effect that a free medical consultation will be offered.
 - (d) the statements concerning the nature and/or effects of the Velashape body slimming treatment which are misleading, exaggerating and/or claiming superiority over others.
 - (e) the statements concerning the nature and/or effects of the Gentle Lase laser treatment which are misleading, exaggerating and/or claiming superiority over others.
 - (f) the statements concerning the nature and/or effects of the Elite Plus treatment which are misleading, exaggerating and/or claiming superiority over others.

In relation to the facts alleged, he has been guilty of misconduct in a professional respect.”

Second Complaint

“He, being a registered medical practitioner, in respect of an article published in the July 2009 issue of the magazine Capital CEO (“the said article”), sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of:-

- (1) statements containing promotional materials relating to his experience, skills and/or practice in the said article;

- (2) the said article which promoted the business of “I-Sky Beauty” with which he had a financial and/or professional relationship.

In relation to the facts alleged, he has been guilty of misconduct in a professional respect.”

Third Complaint

“He, being a registered medical practitioner:-

- (1) in or around January 2010, exhibited in connection with his practice associated with an organisation known as Medical and Phototherapy Beauty Centre 彩光醫學美容中心 (“the Centre”) a signboard at Wai Fung Plaza in Mongkok, contrary to section 5.2.3.1 of the Code of Professional Conduct for the Guidance of Registered Medical Practitioners in that:
 - (a) the size of the said signboard exceeded that permitted under the said Code;
 - (b) he allowed his photograph be displayed in the said signboard;
- (2) in or around January 2010, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of the statements in the website of an organisation known as I-Sky Beauty, with which he had a financial and/or professional relationship, to the effect that the consultation fee and the professional charges for injection in relation to Botox treatment offered by I-Sky Beauty will be waived, for the purpose of canvassing for patients;
- (3) in respect of an advertisement / article in the 467th Issue of “3 週刊” dated 18 September 2008, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of the following statements / information therein which promoted the services provided by I-Sky Beauty, with which he had a financial and/or professional relationship:
 - (a) his photograph,
 - (b) statements concerning the nature and/or effects of the “Velashape” body slimming treatment which are misleading and/or exaggerating; and

- (c) promotional statement to the effect that a special price for the “Velashape” body slimming treatment will be offered to the readers of “3 週刊”.
- (4) in respect of an advertisement / article in the 751st Issue of Sudden Weekly “忽然一週” dated 18 December 2009, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of the following statements / information therein which promoted the services provided by the Centre, with which he had a financial and/or professional relationship:
- (a) his photographs;
 - (b) statements concerning the nature and/or effects of “Smoothbeam” which are misleading and/or exaggerating;
 - (c) statements concerning the nature and/or effects of “Platelet Rich Plasma” which are misleading and/or exaggerating; and
 - (d) coupons offering discounted rates in relation to the treatments provided by the Centre.
- (5) in respect of an advertisement in the Headline Daily “頭條日報” dated 15 March 2010, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of the following statements / information therein which promoted the services provided by the Centre, with which he had a financial and/or professional relationship: –
- (a) his photograph;
 - (b) statements concerning the nature and/or effects of “Laser Facial” treatment that are misleading and/or exaggerating; and
 - (c) promotional statement to the effect that a discounted rate will be offered to new customers in relation to the “Laser Facial” treatment provided by the Centre;
- (6) failed to quote his primary qualification, i.e. MBBS (Ncle) as the first qualification to be shown in the advertisement mentioned in paragraph (5) above, contrary to the “Advice in regard to the qualifications that are acceptable to the Council for use on signboards, letter-heads, visiting cards etc” issued by the Medical Council in November 2001;

- (7) in or around May 2010, sanctioned, acquiesced in, or failed to take adequate steps to prevent the distribution of promotional leaflets of the Centre, with which he had a financial and/or professional relationship, in that the leaflet contained –
- (a) his photographs;
 - (b) statements concerning the nature and/or effects of “Laser Facial” treatment that are misleading and/or exaggerating;
 - (c) promotional statement to the effect that a discounted rate will be offered to new customers in relation to the “Laser Facial” treatment provided by the Centre;
 - (d) statements concerning the nature and/or effects of “幹細胞肌膚再生技術” treatment that are misleading and/or exaggerating;
 - (e) promotional statement to the effect that a free treatment of “幹細胞再生技術療程” will be offered to those who become member of the Centre;
 - (f) statements concerning the nature and/or effects of “二極體暗瘡控油激光 Smoothbeam” treatment that are misleading and/or exaggerating; and
 - (g) promotional statement to the effect that a discounted rate will be offered in relation to the first trial of the “Smoothbeam 控油激光療程” treatment provided by the Centre.”

In relation to the facts alleged, he has been guilty of misconduct in a professional respect.”

Fourth Complaint

“He, being a registered medical practitioner:-

- (1) in respect of an advertisement/article published in the ME Magazine dated 9 April 2010, sanctioned, acquiesced in, or failed to take adequate steps to prevent the use of the title of “皮膚科專科醫生” which was misleading to the public that he was a specialist in dermatology, when in fact his name was not included in the Specialist Register under the specialty of “Dermatology and Venereology”;

(2) in respect of an advertisement/article published in the Sudden Magazine “忽然一週” dated 23 April 2010, sanctioned, acquiesced in, or failed to take adequate steps to prevent the publication of the following information which promoted the services provided by an organization known as Medical and Phototherapy Beauty Centre 彩光醫學美容中心 (“the Centre”), with which he had a financial and/or professional relationship:-

- (a) his photographs;
- (b) statements concerning the nature and/or effects of “Platelet Rich Plasma” treatment which are misleading and/or exaggerating;
- (c) a coupon offering advantage to those becoming members of the Centre for a free “Platelet Rich Plasma” treatment;
- (d) statements concerning the nature and/or effects of “Smoothbeam” treatment which are misleading and/or exaggerating;
- (e) a coupon offering a discounted rate in relation to the “Smoothbeam” treatment.

In relation to the facts alleged, he has been guilty of misconduct in a professional respect.”

Facts of the cases

2. All 4 cases are concerned with the publication of impermissible information in various media such as newspapers, magazines, websites and leaflets, which promoted the businesses of 2 beauty centres, namely, I-Sky Beauty (“I-Sky”) and Medical and Phototherapy Beauty Centre (“M&P”).

3. The Defendant was one of the founders of these beauty centres. He also practised as a medical consultant in these beauty centres.

4. The information published included, inter alia, misleading and exaggerated statements about the efficacy, superiority and uniqueness of various treatments provided by the beauty centres, namely:-

- (a) “Velashape” body slimming treatment;
- (b) “Gentle Lase” laser treatment;

- (c) “Elite Plus” treatment;
- (d) “Laser Facial” treatment;
- (e) “二極體暗瘡控油激光 Smoothbeam” treatment;
- (f) “幹細胞肌膚再生技術” treatment; and
- (g) “Platelet Rich Plasma” treatment.

5. Discounts and privileges were also offered to readers in order to attract them to use the services of the centres.

6. The information published also included a misleading description of the Defendant as a “皮膚科專科醫生” which suggested that he was a specialist in dermatology.

7. I-Sky and M&P commenced operation at the relevant addresses around January 2008 and April 2009 respectively. During the period from September 2008 to May 2010, various advertisements containing the information in question were published in the newspapers, magazines, websites and leaflets.

8. During that period, the Defendant was a host speaker in a radio programme about skin care. The hour-long programme was broadcast weekly every Friday. Advertisements placed by I-Sky were aired during the programme. Audience who phoned in during the programme was contacted afterwards by I-Sky for promotional sales of its services.

Council’s findings

9. Save for Charge 1 in the Fourth Complaint, the Defendant does not contest any of the charges against him. Nevertheless, it remains our duty to determine whether the allegations in the charges constitute professional misconduct.

Rules on provision of doctors’ service information

10. Doctors can, and should, provide proper information about their medical services to the public, so as to facilitate the public in making an informed choice of doctors.

11. However, the provision of such service information must comply with the regulations set out in The Professional Code and Conduct (November 2000 version) and the Code of Professional Conduct (January 2009 version). The purpose of such regulations is to protect the public from misleading advertisements. This is important, as persons seeking medical services are particularly vulnerable to persuasive influence.

12. Any information provided by a doctor to the public must not be exaggerated or misleading, claim superiority over other doctors, or claim uniqueness without proper justifications. The information must not aim to solicit or canvass for patients. The information must not be used for commercial promotion of medical and health related products and services. It must not be sensational or unduly persuasive. It must not generate unrealistic expectations.

13. Doctors are not allowed to use their professional status for commercial endorsement or promotion of any product or service.

14. A doctor who has a financial or professional relationship with an organization must exercise due diligence (but not merely nominal efforts) to ensure that the organization does not advertise in contravention of the principles and rules applicable to individual doctors. Due diligence shall include acquainting himself of the nature and content of the organization's advertising, and discontinuation of the relationship with an organization which is found to be advertising in contravention of the principles and rules.

Common control of both beauty centres

15. I-Sky and M&P were separately incorporated companies. However, they were directly related to each other through a series of transactions between off-shore and local companies. Suffice it to say that both centres were effectively controlled by the same persons.

Defendant's role in promotion campaign

16. It is clear that the series of advertisements in the newspapers, magazines, websites and leaflets were parts of a concerted promotion campaign to promote the businesses of the two beauty centres and to attract customers to the services provided by them.

17. In almost all of the advertisements, the Defendant was featured prominently. There were photographs of him posing either alone or together with beauty consultants of the centres, and description of his expertise in cosmetic medicine and dermatology.

18. The campaign was supplemented by feature articles in magazines with the Defendant being interviewed on the topics of skin care and cosmetic medicine, and the weekly radio programme about skin care. There were references to the radio programme in the feature articles and in the advertisements.

19. The inter-relationship between the advertisements, interviews, radio programme, websites and leaflets, coupled with the regularity they were published or broadcast, indicated that it was a regular and coordinated promotion campaign through a multi-media approach.

20. The Defendant actively and directly participated in the various aspects of the promotion campaign. He was one of the founders of the beauty centres. According to a letter from the chairman of I-Sky provided by the Defendant to the Preliminary Investigation Committee (“PIC”), the whole company would collapse immediately if the Defendant left it. This shows that he was the key figure in the operation of at least I-Sky.

21. In the circumstances, it was completely unrealistic and artificial for the Defendant to claim in his explanation to the PIC that he was merely a part-time medical consultant of I-Sky with no right to take part in the management and advertising activities of I-Sky.

22. We are satisfied that the Defendant was actively involved in and was fully aware of the advertisements in the promotion campaign.

Offering discounts and privileges

23. It is improper for a doctor to offer discounts and privileges in order to attract people to undergo medical treatment, as discounts and privileges will unduly influence them to undergo treatment on the basis of financial incentives instead of their need. It will also improperly influence people to undergo treatment which may be unnecessary or not medically indicated.

Misleading or exaggerated statements

24. The advertisements contained statements about the efficacy, superiority and uniqueness of various treatments, such as:-

- (a) “Velashape” body slimming treatment: success rate reaching 100%; 2 to 10 cm reduction after each treatment.
- (b) “Gentle Lase” laser treatment: the most effective, painless, fastest and most thorough hair removal laser device, with 100% success rate; skin lightening at the same time.

- (c) “Elite Plus” treatment: specifically tackle skin pigimentary conditions such as freckles and solar lentigo.
- (d) “Laser Facial” treatment: completely tackle melasma, lentigines, pore size, skin complexion, acne, skin lightening, and facial hairs.
- (e) “二極體暗瘡控油激光 Smoothbeam” treatment: most effective technology for treatment of acne; 40%, 60% and 80% improvement after 1, 2 and 3 treatments respectively.
- (f) “幹細胞肌膚再生技術” treatment: effectively revitalize stem cells and regenerate skin, with magical effects on wrinkles, loose skin, hair pores and dull skin.
- (g) “Platelet Rich Plasma” treatment: extremely conducive to regenerating skin; magical effect in reproducing youth.

25. Expert evidence shows that these claims are at least exaggerated. Some are misleading, and others entirely false. To cite a few examples:-

- (a) “Velashape” body slimming treatment
 - The claimed 100% success rate and amount of reduction in circumferential measurement are not supported by any reliable evidence-based study.
- (b) “Gentle Lase” laser treatment
 - It is untrue to claim that the treatment is painless, as the average pain score is 5 to 6 on a scale of 10. Topical anaesthetic is often used to reduce the pain.
 - It is not the most effective hair removal treatment, as treatment with shorter wavelength lasers has greater efficacy.
 - It is contradictory to claim that the treatment can have skin lightening, as it can have the side effect of hyperpigmentation.
 - The claimed 100% success rate in hair removal differs from the average of 50% hair reduction in randomized and non-randomized controlled trials.

(c) “Elite Plus” treatment

- It is untrue and in fact contradictory to claim that the treatment specifically tackles pigmentary conditions such as freckles and solar lentigo. It has a fixed spectrum of wavelengths and is less specific than laser (which has a fixed wavelength and is highly selective).

(d) “Laser Facial” treatment

- It is misleading and exaggerated to claim that the treatment is a complete solution to melasma, lentigines, pore size, skin complexion, acne, skin lightening, and facial hairs.
- It can improve melasma temporarily, but the effect is not long lasting and can rebound.
- There is no clinical data to support the use of this laser for skin lightening and for acne treatment.
- The laser can only induce temporary hair reduction.

(e) “二極體暗瘡控油激光 Smoothbeam” treatment

- It is simply untrue that there is 40%, 60% and 80% improvement of acne after 1, 2 and 3 treatments respectively, as the studies results show much lower efficacy.
- There is doubt as to whether this laser has any impact on the sebaceous glands’ functioning.
- The gold standard for acne treatment is oral medication.

(f) “幹細胞肌膚再生技術” treatment

- This is a grossly misleading Chinese term adopted by the Defendant for “Platelet Rich Plasma” treatment, which does not involve any stem cell at all.
- “Platelet Rich Plasma” is plasma with enriched growth factors. There is no stem cell.
- Stem cells in adults are mainly sourced from adipose tissues and bone marrow.

(g) “Platelet Rich Plasma” treatment

- “Platelet Rich Plasma” is commonly abbreviated as “PRP”. There is no evidence that PRP treatment can lead to regeneration of tissues.
- Although PRP can sometimes promote wound healing by enriching the growth factor depleted area with growth factors, it has nothing to do with rejuvenation.
- There is no scientific evidence to support the use of PRP in facial rejuvenation, as it is only used in the context of wound healing. There are only level IV and V evidences for the use of PRP in acute and chronic wounds. There is little or no systematic evidence of clinical benefits in aesthetic surgery.
- PRP is not an accepted aesthetic procedure in the specialty of Plastic Surgery. It is described by the President of the American Society of Plastic Surgeons as a gimmick as antiquated as bloodletting. It is not approved by the Food and Drug Administration of the United States for cosmetic purposes.
- PRP is an autologous product, i.e. it comes from the same person back to whom it is injected. It is not registered by the Department of Health as a pharmaceutical product.
- The Defendant claimed that PRP treatment is a new treatment and just another case for off-label use.
- Off-label use is the practice of prescribing drugs for an unapproved indication or an unapproved age group, unapproved dosages or unapproved form of administration. It is used when there is a legitimate purpose. Off-label use must be independently decided by a doctor for a particular patient. It is highly inappropriate and unacceptable for I-Sky to promote off-label use indiscriminately.
- The single spin technique as demonstrated by the Defendant in the feature article cannot produce plasma with an effective concentration of platelets. In addition to concentrating the platelets, more processes are required to release the growth factors from the platelets to the plasma.
- For manipulation of blood products, there is always a risk of contamination which would have significant and sometimes fatal consequence. Depending on the time lapse, bacteria will multiply

in the plasma and injecting the contaminated plasma back into the patient will cause infection. If injected into blood vessels, it will cause sepsis and a toxic shock syndrome which is potentially fatal.

- The manipulation of blood products may involve the risk of misidentification, which may be fatal.

26. Furthermore, in all the advertisements, there was no mention of the risks, side effects and alternative treatments.

Charges except Fourth Complaint Charge (1)

27. For the above-mentioned reasons, we are satisfied that the Defendant sanctioned the publication of all the advertisements and interviews set out in each of the charges except Charge (1) in the Fourth Complaint.

28. We have considered each of those charges separately and independently, in the context of the promotion campaign. We are satisfied that the Defendant's conduct in respect of each of those charges has fallen below the standard expected amongst registered practitioners and constitutes professional misconduct. We find him guilty of each of those charges, i.e. all charges except Charge (1) in the Fourth Complaint.

Fourth Complaint Charge (1)

29. As to Charge (1) in the Fourth Complaint in respect of the title “皮膚科專科醫生”, the Defendant's explanation to the PIC was that he did not provide any interview or information to the magazine, and his name and photographs were used by the magazine without his prior knowledge and consent. When he became aware of the publication in April 2010, he immediately made objection to the publisher about the title “皮膚科專科醫生” and demanded correction of the wrong title. A correction notice was therefore published in the magazine on 23 April 2010.

30. In the offending article the Defendant's photograph and quotation of the Defendant's statements were published together with the title in question. The subsequent correction notice read as follows:-

“173期 Beauty Feature P.88 ME TIPS 的受訪者任鎮雄, 其專業資格應為醫生, 特此更正, 不便之處, 敬請原諒。”

31. If the magazine published the article without the Defendant's consent at all, the natural move would be for the Defendant to ask for withdrawal of the whole article instead of only the title. Furthermore, the correction notice would not have described the Defendant as "the interviewee", and the Defendant would not have accepted that correction notice without further objection. The only reasonable inference is that, contrary to his claim, the Defendant took part in the interview, and the contents of the article were published with his consent.

32. Nevertheless, we accept that the magazine could have tried to bolster the credibility of the article by adopting a more authoritative title without consulting the Defendant. In the circumstances, we have to consider whether the Defendant should have taken precautions to prevent the title or other titles to the same effect from being published.

33. Obviously the Defendant was heavily involved in the promotion campaign of the beauty centres. He had been interviewed on a number of other occasions as a doctor with expertise in skin care. The interview in question is on the topic of skin care. He should have been aware of the possibility that a description or title to the effect that he was a doctor with special expertise or competence in skin care might be used by the magazine. He should have taken precautions to ensure that this would not happen. In failing to take such precautions, his conduct has fallen short of the standard expected amongst registered medical practitioners.

34. We are satisfied that the Defendant's conduct, in failing to take the necessary precautions in a situation which he should have, constitutes professional misconduct. We find him guilty of Charge (1) in the Fourth Complaint.

35. In conclusion, we find him guilty of each and every charge. In respect of Charge (1) in the Fourth Complaint, he is found guilty on the limb of failing to take necessary precautions. In respect of all other charges, he is found guilty on the limb of sanctioning.

Sentencing

36. The Defendant has a clear record.

37. It is our published policy to give credit for cooperation and honest admission during preliminary investigation and in the inquiry. Defence Solicitor urges upon us to give the Defendant credit for remorse and cooperation during the inquiry by not contesting the charges except one.

38. Defence Solicitor told us at the beginning of the inquiry that the Defendant would not contest the charges except one. However, she subsequently clarified that what she meant was that the Defence was not admitting anything and the Council would have to decide whether each of the charges has been proven to the required standard. In other words, the claim of not contesting the charges was no more than lip service, and she was putting the Legal Officer to strict proof on each charge.

39. We also note that during preliminary investigation of each of the 4 cases, the Defendant put forward claims of lack of knowledge and control of the advertisements. Three of these PIC submissions were adduced as Defence evidence in the inquiry, which in effect was direct denial of all the charges. We have found that these claims were untrue. In the circumstances, we do not accept that the Defendant has shown any remorse. Only a small degree of discount will be given for the clear record and the nominal cooperation during the inquiry. There is no other mitigation of weight.

40. Since 2006 this Council has issued a clear warning that in view of the rampant situation of practice promotion, in future cases of practice promotion offenders should expect to be removed from the General Register for a short period with suspension of the order, and in serious cases the removal will take immediate effect. The message is loud and clear and has been repeated from time to time, and there can be no excuse for doctors to claim that they are not aware of the serious view which the Council takes.

41. These 4 cases are by far the most serious cases of unauthorized advertising and practice promotion. There are a number of aggravating factors:-

- (a) It was a systematic, well organized and large-scale campaign designed to bombard the public with the offending information from all directions through multiple media. The campaign lasted for at least 20 months.
- (b) The advertisements consisted of false claims instead of mere canvassing for patients or minor exaggeration of efficacy. These false claims (in particular those relating to PRP) can potentially have serious consequences.
- (c) It was a deliberate and blatant abuse of the Defendant's professional status for the commercial promotion of the businesses of the 2 beauty centres and to maximize the effect of the promotion campaign of the beauty centres.
- (d) Despite the fact that the Defendant had been warned of the First Complaint by the PIC notice dated 4 August 2009, he continued to

actively participate in the promotion campaign at least up to May 2010.

42. Having regard to the high gravity of the 4 cases, we consider that an order of removal from the General Register for a period of 9 months is required. Giving him credit for the mitigation, we order that his name be removed from the General Register for a period of 8 months.

43. We have considered whether the order can be suspended. It is clearly not a case for suspension.

44. While it is for the future Council to consider the Defendant's application for restoration to the General Register (if any) when it is made, we recommend that the Council should require the Defendant to attend continuing medical education course(s) in medical ethics to the equivalent of 10 CME points, and the course be approved in advance by the Council.

Prof. Felice LIEH-MAK, GBS, CBE, JP
Temporary Chairman, Medical Council