Sample NMC Guidelines Compliance Audit Report

Ethical advertising and digital compliance under the NMC Guidelines on Ethical Advertising and Public Communication (Public Notice R-13014/01/2024-Ethics, 6 October 2026). Built for RMPs, clinics, hospitals, corporate healthcare groups, and pharma and medtech compliance teams.

Audit overview	
Audited entity	CityCare Multispecialty Hospital and Allied Clinics (fictional)
Entity registration	Clinical Establishments Act registration no. CEA/XX/2021/0000 (placeholder)
Doctors in scope	18 consultants across 9 specialties
Audit scope	Website and blog, Google Search Ads, Meta campaigns, doctor directories (Practo, Justdial), Google Business Profile, Instagram, Facebook, YouTube, WhatsApp broadcasts, print (signboards, letterhead, brochures, billboards), agency, influencer, distributor and referral arrangements
Content period	Everything live on the audit date, including posts published before 6 October 2026
Audit date	2 November 2026
Reference framework	NMC notice of 6 Oct 2026; IMC (Professional Conduct, Etiquette and Ethics) Regulations, 2002; Telemedicine Practice Guidelines, 2020; Clinical Establishments Act / state law; DPDP Act, 2023; UCPMP 2024 and CDSCO rules where products are involved; Google and Meta healthcare ad policies
Prepared by	Digital Crats healthcare marketing compliance team

How to use this sample

Replace the fictional findings with your own and keep the structure: scope, scored findings, verdict, action plan, sign-off. Keep dated evidence (screenshots, URLs) for each finding. A documented audit with dated corrections is your best evidence of good faith if a State Medical Council complaint arises.

Executive compliance summary

Category	Parameters	Compliant	Non-compliant	Highest risk
Doctor credentials, identity and registration	6	1	5	High
Advertising claims, superiority terms and outcomes	7	1	6	Critical
Patient testimonials, images and data	5	1	4	Critical
Reviews, ratings and rankings	3	0	3	High
Offers, inducements and referral payments	4	2	2	Critical
Product endorsements and third parties	2	0	2	High
AI-generated content and disclosures	3	0	3	Critical
Website, privacy, telemedicine and legacy content	7	2	5	High
Overall	**37**	**7 (19%)**	**30 (81%)**	**High risk**

Severity	Findings	Meaning	Required action
Critical	8	Clearly prohibited or deceptive content, patient data exposure, referral payments	Remove within 24–48 hours; legal review
High	11	Prohibited claims, offers, endorsements, paid rankings	Pause and fix within 7 days
Moderate	10	Missing disclosures, incomplete information	Correct within 30 days
Low	1	Improvements, no direct breach	Next routine update
Compliant	7	Meets the requirement	Re-check next quarter

Audit verdict: High risk. 30 of 37 parameters (81%) are non-compliant, including 8 critical findings. The main drivers are promotional patient testimonials on YouTube, superiority claims in search ads ('Best Joint Replacement Hospital', '#1 Cardiology Center in State'), a commercial AI-generated promotional reel, and per-patient referral fees. Immediate remediation is recommended.

Scale note: severity levels are an agency working model, not an NMC classification. Disciplinary action is decided by the State Medical Council under the NMC Act.

Detailed findings

1. Doctor credentials, identity and registration

ID	Requirement	Finding	Status	Corrective action
DC-CR-01	Full registered name on every profile	Dr. Arishta Sharma shown as 'Dr. A. Sharma' on website and Practo.	Moderate	Display the full name exactly as entered in the State Medical Register.
DC-CR-02	Registration number disclosed on electronic media (para 3.2, Explanation III)	SMC/NMR registration number missing on 3 of 18 consultant bios and on all Instagram bios.	Moderate	Add name, qualifications, registration status and SMC/NMR number to every bio, listing and post template.
DC-CR-03	Only recognised qualifications shown as degrees	A non-recognised fellowship listed as the primary degree in one cardiologist's title.	Moderate	Show recognised degrees in the title; move other training to a 'Clinical training' section.
DC-CR-04	Signboard and letterhead credentials match council records	Signboards match State Medical Council records.	Compliant	None.
DC-CR-05	No self-photographs on signboard or letterhead	Hospital letterhead carries the medical director's photograph.	Moderate	Reprint letterhead without photographs.
DC-CR-06	No doctor photographs used for self-advertisement	Billboard uses a surgeon's portrait with the line 'Trusted hands'.	High	Withdraw the billboard; use factual department information.

2. Advertising claims, superiority terms and outcomes

ID	Requirement	Finding	Status	Corrective action
DC-AD-01	No superiority claims unless objectively verifiable	Google Search Ad title: 'Best Joint Replacement Hospital'; site header: '#1 Cardiology Center in State'.	Critical	Pause ads now. Replace with factual copy, e.g. 'Orthopaedic and Joint Care Department'.
DC-AD-02	No cure guarantees or promotional success rates	Landing page: '99.8% Success Rate in Cataract Surgeries'.	Critical	Remove the percentage. Describe the procedure, risks, recovery and alternatives.
DC-AD-03	No pain-free or zero-risk claims	Social banner: '100% Pain-Free Dental Implants'.	High	Remove '100%' and 'Pain-Free'; state risks and recovery factually.
DC-AD-04	No procedure-volume boasts used promotionally	Reel: '10,000+ successful surgeries'.	High	Remove volume figures from promotional content.
DC-AD-05	No fear-based marketing or demand creation	WhatsApp broadcast: 'Don't wait for a heart attack, book a full cardiac package today'.	High	Replace with neutral awareness content on warning signs and when to see a doctor.
DC-AD-06	Factual disclosure of infrastructure	Bed count, ICU capacity and diagnostic facilities accurate.	Compliant	Review quarterly.
DC-AD-07	Awards and rankings verified, no superiority framing	'Best Hospital 2025' badge from a paid listing portal.	High	Remove the badge; list only verifiable awards without superiority wording.

3. Patient testimonials, images and data

ID	Requirement	Finding	Status	Corrective action
DC-TM-01	No promotional patient testimonials	YouTube channel: 14 patient video reviews endorsing the hospital; homepage testimonial slider.	Critical	Unpublish or make private all promotional testimonials and remove the slider.
DC-TM-02	No before-and-after images in promotion	Meta ad set shows hair transplant transformation photos.	Critical	Stop the ad set. Outcome photos may be used only in strictly scientific or educational material, anonymised and consented.

ID	Requirement	Finding	Status	Corrective action
DC-TM-03	No celebrity, influencer or patient endorsements	Influencer reel promoting the IVF centre.	Critical	End the collaboration and remove the content.
DC-TM-04	Patient data and images protected	Patient X-ray with name visible in a Facebook post.	Critical	Delete the post; train staff on patient data handling under the DPDP Act, 2023.
DC-TM-05	Consent documented for educational case material	Published case report has signed, anonymised patient consent on file.	Compliant	Keep consent records for all educational cases.

4. Reviews, ratings and rankings

ID	Requirement	Finding	Status	Corrective action
DC-RV-01	No paid, fake or incentivised reviews	Google Business Profile: automated post-visit messages offering a discount for 5-star reviews.	High	Stop incentives. Reviews must be unsolicited and organic.
DC-RV-02	No paid ranking or 'featured doctor' placements	Paid 'Top Doctor' placement on a doctor-listing app.	High	Cancel paid ranking placements.
DC-RV-03	No bought followers or engagement	Purchased Instagram followers detected in a 2025 invoice.	Moderate	Stop purchases; do not cite follower counts as standing.

5. Offers, inducements and referral payments

ID	Requirement	Finding	Status	Corrective action
DC-FN-01	No discounts or packages designed to attract patients	'Diwali 30% off full-body check-up' on Meta Ads and WhatsApp.	High	End the campaign. A factual fee schedule is permitted.
DC-FN-02	No referral fees, commissions or gifts linked to patients	Referring GPs receive a fee per admitted patient.	Critical	End per-patient referral payments; seek legal review.
DC-FN-03	Agency paid on fixed fee, not per patient	Marketing agency on a fixed monthly retainer.	Compliant	None.
DC-FN-04	Factual declaration of charges	Consultation fees listed factually on the website.	Compliant	None.

6. Product endorsements and third parties

ID	Requirement	Finding	Status	Corrective action
DC-EN-01	No doctor endorsement of medicines, devices, diagnostics or supplements	Gynaecologist recommends a named supplement brand in a YouTube video.	High	Remove the video; brief doctors on the endorsement ban.
DC-EN-02	Third-party content reviewed (distributors, employers, platforms)	Device distributor's page reposts hospital testimonials naming a surgeon.	Moderate	Request removal; add NMC-compliance clauses to third-party contracts.

7. AI-generated content and disclosures

ID	Requirement	Finding	Status	Corrective action
DC-AI-01	No commercial AI-generated promotional campaigns	Promotional reel uses a synthetic AI voiceover and AI 'happy patient' images.	Critical	Withdraw the campaign.
DC-AI-02	AI-origin disclosure on permitted AI-assisted content	12 AI-assisted health guides on the blog without labelling.	Moderate	Label each, e.g. 'Prepared with AI assistance and reviewed by Dr. [Name], Reg. No. [ ]'.

ID	Requirement	Finding	Status	Corrective action
DC-AI-03	RMP review and sign-off of public health content	Health awareness articles lack a reviewing doctor's name and sign-off.	Moderate	Assign an RMP reviewer and show the reviewer's name and registration number.

8. Website, privacy, telemedicine and legacy content

ID	Requirement	Finding	Status	Corrective action
DC-WB-01	Specialty pages state risks, recovery and alternatives	PRP and LASIK pages list benefits only.	Moderate	Add risks, recovery, alternatives and a reviewer credit.
DC-WB-02	SEO titles and meta descriptions free of claims	Title tag: 'No.1 Cardiologist in Pune'.	High	Rewrite titles and descriptions factually.
DC-WB-03	Privacy notice and consent-based forms	Appointment form lacks a consent checkbox and DPDP Act notice.	Moderate	Add consent wording and a privacy notice.
DC-WB-04	Disclaimer and medical information context	Site-wide medical disclaimer present.	Compliant	None.
DC-WB-05	Telemedicine content follows Telemedicine Practice Guidelines, 2020	Teleconsultation page compliant.	Compliant	None.
DC-WB-06	Legacy content published before 6 Oct 2026 audited	Older posts with testimonials and offers still live.	High	Audit and remove non-compliant posts; there is no transition window.
DC-WB-07	Structured data supports factual answers	No Physician or MedicalOrganization schema.	Low	Add FAQPage, MedicalOrganization and Physician schema.

30-day remediation roadmap

Phase	Timing	Actions
1. Stop the risk	Within 24 hours	Pause search and social ads with 'Best', '#1', 'guaranteed', success rates or discounts. Withdraw the AI-generated promotional reel. Delete posts exposing patient data. Suspend per-patient referral payments.
2. Triage assets	Days 2–7	Unpublish or make private promotional testimonials, before-and-after content, influencer content and incentivised-review messages. Cancel paid ranking placements. Remove billboard and award badges.
3. Correct credentials and pages	Days 8–14	Update every bio and listing with full registered name, recognised qualifications and SMC/NMR number. Rewrite title tags and landing pages factually with risks, recovery and alternatives.
4. AI and content policy	Days 15–21	Label AI-assisted content, add RMP reviewer credits, add consent wording and a privacy notice to forms, add structured data.
5. Build the workflow	Days 22–30	Set up an internal medical review committee for all marketing sign-off. Add compliance clauses to agency, distributor and platform contracts. Audit legacy posts. Schedule a re-audit at day 30 and quarterly after that.

Owners and tracking

ID	Owner	Due	Evidence of fix	Status
DC-AD-01, DC-AD-02	Digital marketing / agency	Day 1	Ad copy screenshot, change log	Open
DC-TM-01 to DC-TM-04	Marketing head	Day 7	Unpublished video list, URLs	Open
DC-FN-02	Medical director, legal	Day 1	Board note ending referral fees	Open
DC-AI-01	Agency	Day 1	Campaign withdrawal confirmation	Open
DC-CR-01 to DC-CR-06	HR / medical administration	Day 14	Updated bios, listings	Open
All remaining	Compliance owner	Day 30	Re-audit report	Open

Sign-off

Role	Name	Signature	Date
Medical director			
Compliance owner			
Marketing head			
Auditor			

Official sources: NMC notice PDF: nmc.org.in/whats-new/download/1874 | National Medical Commission: nmc.org.in | Department of Pharmaceuticals (UCPMP): pharmaceuticals.gov.in | CDSCO: cdsco.gov.in | DPDP Act: meity.gov.in

Disclaimer: Illustrative sample with a fictional entity and fictional findings. It reflects Digital Crats' reading of the NMC public notice dated 6 October 2026 and is not legal advice or a certification of compliance. Digital Crats is a healthcare marketing agency, not a law firm. Full guide: digitalcrats.com/nmc-guidelines-india/