



AN ANALYSIS OF MEDICAL NEGLIGENCE LAWS IN INDIA

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Abstract : When another person neglects to exercise due care to eliminate what a reasonable person would see as a foreseeable risk, they have committed the legal wrong known as the Tort of Negligence. The general people in India is becoming more conscious of medical negligence. Medical negligence is defined as the failure of a doctor or medical professional to provide the necessary care, so breaching their duty and harming their patients, who are their clients. Despite not being mentioned in any Indian legislation, the phrase "medical negligence" is pertinent in the context of Indian law since it describes the inappropriate actions or inactions of medical professionals who have a duty and a standard of reasonable care towards their patients. Examples of medical malpractice or carelessness include conducting unnecessary or inappropriate surgery on a patient, providing inaccurate medical advice, prescribing the incorrect drug, and leaving any foreign materials, such as a towel or bandage, on the patient. Medical negligence lawsuits in India are normally filed as civil proceedings for damages in the court of law. Criminal charges may be pursued against the healthcare practitioner in some situations if their negligence resulted in the death of a patient. Because this topic is so extensive, we will limit ourselves to studying the fundamental principles that are required for negligence to be committed. We will explore the essentials of medical negligence and the legal remedies available to the patients, as well as who bears the burden of proof and when that responsibility passes on to the other side. There are also suggestions to improve the current situation of medical negligence.

Keywords: Negligence, Medical Negligence, Law of Torts, Burden of proof, Liabilities, Consumer Protection Act.

Introduction

Negligence is commonly defined as activity that is below the standard expected in society or required by law, as well as the failure to exercise the amount of care or caution necessary to ensure the safety of others. It just denotes negligence. A legal wrong known as the Tort of Negligence is done when someone else fails to take the necessary steps to eliminate a risk that a reasonable person would deem foreseeable. In general, there is a legal requirement to consider when it is foreseeable that acting otherwise may cause harm. Negligence is a method in which many different types of accidents may occur by neglecting to take such essential precautions. The word "negligence" is derived from the Latin term "neglencia," which means "failure to pick up." The law of negligence is based on the ideals of justice, equity, and morality.¹ There will frequently be an implied or explicit contract between the parties, such as between a physician and a patient, an employer and an employee, or a bank and a customer. Nevertheless, even in situations where there is no express or implied contract between the parties involved, the civil law controlling negligence has evolved and been broadened to deal with situations involving two or more parties. It follows from a practical and financial standpoint that every company must ensure that management planning continually fully takes into account the duties imposed and the possible liabilities that may be incurred under what is a constantly evolving legal framework.²

Everyone who chooses a profession is guaranteed to do it with expertise and effectiveness. He ensures that the talents they possess will be used with devotion. He also promises to work with acceptable care and expertise.

So, according to the requirements of negligence, a professional would be negligent in two situations firstly, the professional did not possess the necessary skills, and secondly, the professional did not exercise with reasonable competence. Similar to this, a doctor cannot assure a patient of the success of their treatment. When a patient visits a doctor, they want to receive treatment utilising all of the specialist's expertise and abilities to solve their particular medical problem. A doctor has duties to patients as part of his work, and if those duties are not upheld, the doctor might be held accountable for medical negligence.³ Medical malpractice or negligence

¹ Priyanjali Priyadarshini, "Medical Negligence under Law of Torts", Lawcolumn, Published on: February 7, 2021, [Medical Negligence under Law of Torts | Law column](#), Last visited: February 22, 2023.

² "The Tort of Negligence", Lawteacher, , Published on: September 20, 2021, [The Tort of Negligence \(lawteacher.net\)](#), Last visited: February 22, 2023.

³ "MS Pandit and Shobha Pandit, Medical negligence: Coverage of the profession, duties, ethics, case law, and enlightened defense - A legal perspective, Page : 372, Indian Journal of Urology, 2009." [Medical negligence: Coverage of the profession, duties, ethics, case law, and enlightened defense - A legal perspective Pandit M S, Pandit S - Indian J Urol.](#)

examples include performing unnecessary or incorrect surgery on a patient, giving bad medical advice, prescribing the improper medication, and leaving any foreign objects, like a towel or bandage. In the context of law, medical negligence is the violation of a duty of care that leads to harm or damage.

In India, awareness of patient rights is rising. The recent uptick in lawsuits involving the legal responsibility of medical personnel and the medical establishment makes this trend quite evident. The Apex Court's decision in the Anuradha Saha medical malpractice case represents a watershed moment in the history of medical law. The court enhanced the burden of proof on medical professionals as well as decided how to determine their liability in the case of a patient's death.⁴ This article aims to analyse medical negligence and its legal position in India.

Meaning of Negligence under Law of Torts

The word "negligence" refers to complete carelessness. In general, when it was fairly foreseeable that doing otherwise would probably result in injury, there is a legal need to use caution.

According to Winfield and Jolowicz- "Negligence is the breach of a legal duty to take care which results in damage, undesired by the defendant to the plaintiff."⁵

According to Alderson B in Blyth v Birmingham Waterworks Co.⁶ : "Negligence is the omission to do something which a reasonable man, guided upon those considerations which ordinarily regulate the conduct of human affairs, would do, or doing something which a prudent and reasonable man would not do."

In Jacob Mathew v State of Punjab⁷ the apex court observed: "Negligence is a breach of a duty caused by the omission to do something which a reasonable man, guided by those considerations which ordinarily regulate the conduct of human affairs would do, or doing something which a prudent or reasonable man would not do. Actionable negligence consists in the neglect of the use of ordinary care or skills towards a person to whom the defendant owes a duty of observing ordinary care and skill, by which neglect the plaintiff has suffered injury to his person or property."

This definition of negligence has three components. First, you have a duty of care under the law. Second, the specified duty was breached, and third, there were consequential damage.⁸

What is Medical Negligence?

In its most basic form, medical negligence refers to behaviour on the part of a medical professional or doctor that results in a violation of their duties and harm to the patients who are their customers. A patient receiving care from any doctor surely wants to recover and at the very least expects the doctor to exhibit prudence while performing his duties. A professional is regarded to be at least an expert in that topic. Medical error has resulted in several fatalities and adverse health repercussions for patients.

It is impliedly guaranteed that a person is qualified and trained enough to provide medical advice and treatment if they portray themselves as ready to do so. When a patient consults with such a person, they owe them specific obligations⁹:

1. A duty to use care when considering whether to take up this issue.
2. A requirement to choose the right course of treatment with care.
3. A duty of responsibility for correctly administering that treatment.

In Bolam v. Friern Hospital Management Committee¹⁰, the standard for determining whether a doctor was negligent was established.

In Jacob Mathew vs. State of Punjab and Ors.¹¹ According to the court, the Bolam test is the best way to assess medical negligence. It states that under this standard, a professional may be held liable for negligence on one of two findings: either he lacked the necessary skill he claimed to possess, or he failed to exercise the skill he did possess in the specific case with reasonable competence.

Essentials of Medical Negligence¹²:

The burden of proof is on the plaintiff to demonstrate each of the elements listed below in order for an act or omission to qualify as negligence. The following are frequently the elements that make up medical negligence:

(a) Existence of legal duty to care:

The defendant/medical practitioner must have a legal obligation to the plaintiff/patient as one of the essential elements of medical negligence. The latter approach the former, putting their faith in his specific knowledge and skill. As a result, it is the medical professional's obligation to meet the expectations of the individual who approaches him. The Apex court in Dr. Laxman Balkrishna Joshi Vs. Dr. Trimbak Babu Godbole¹³ had observed that "every doctor must exercise reasonable "standard of care" that are set out in the profession. Any breach towards these duties shall hold him liable for medical negligence."

(b) Breach of that legal duty:

If the person who has been given a legal obligation does not fulfil it as it should have been, that is, with the utmost care, then there has been a breach of that legal obligation.

⁴ Krishna & Saurastri Associates, "Medical negligence: A landmark judgment", India Business Law Journal, Published on: February 20, 2014, [Medical negligence: A landmark judgment | Law.asia](https://www.indiabusinesslawjournal.com/medical-negligence-a-landmark-judgment/), Last visited: February 25, 2023.

⁵ WINFIELD AND JOLOWICZ ON TORT, Ninth Edition, 1971, 6-001.

⁶ (1856) 11 Ex. 781 at 784.

⁷ AIR 2005 SC 3180.

⁸ Dr. R.K Bangia, Law of Torts, chapter-11, Page-224, 24th ed. 2017.

⁹ Lydia Kerketta, "Medical Negligence: A Specific Tort", Legalservices, [Medical Negligence: A Specific Tort \(legalservicesindia.com\)](https://legalservicesindia.com/medical-negligence-a-specific-tort/), Last visited: March 1, 2023.

¹⁰ ([1957] 1 WLR 582).

¹¹ AIR 2005 SC 3180.

¹² Shaik Abdul Matheen, "Medical Negligence - Laws and Remedies in India", LAWGIC STRATUM, Published on: February 26, 2021, <https://www.lawgicstratum.com/post/medical-negligence-laws-and-remedies-in-india> , Last visited: March 4, 2023.

¹³ 1969 AIR 128.

The Hon'ble Supreme Court in Kusum Sharma & Ors. v. Batra Hospital & Medical Research Centre and Ors¹⁴ noted that "22. Negligence : Duties owed to patient. A person who holds himself out as ready to give medical (a) advice or treatment impliedly undertakes that he is possessed of skill and knowledge for the purpose. Such a person, whether he is a registered medical practitioner or not, who is consulted by a patient, owes him certain duties, namely, a duty of care in deciding whether to undertake the case: a duty of care in deciding what treatment to give; and a duty of care in his administration of that treatment (b) A breach of any of these duties will support an action for negligence by the patient (c)."

(c) Damage or harm caused due to the breach of that legal duty:

The final and most important requirement for medical negligence is that the plaintiff/patient suffered harm or damage as a result of the defendant's/medical professional's violation of their duty.

Informed Consent

Informed consent "It is a process of communication between you and your health care provider that often leads to agreement or permission for care, treatment, or services. Every patient has the right to get information and ask questions before procedures and treatments. If adult patients are mentally able to make their own decisions, medical care cannot begin unless they give informed consent."¹⁵

In this case of Dr.T.T.Thomas vs. Smt. Elisa¹⁶ "the question was the liability of a doctor for not performing an emergency operation for want of patient's consent and consequent death of patient. The patient with severe abdominal pain after admission in hospital was diagnosed with acute appendicitis, he needed surgery but it was not done on the same day due to refusal of patient to give consent for operation. There was no mention of consent refusal in case sheet of the patient and Kerala high court held doctor negligent for failure to perform emergency operation."¹⁷

Burden of proof

Generally speaking, the burden of proof rests with the plaintiff to show that the defendant was careless. After the plaintiff has met the initial burden of proving at least a prima facie case of negligence against the defendant, the defendant must demonstrate that the incidence was the result of an unforeseen accident on the part of plaintiff.¹⁸ In Nizam Institute of Medical Sciences vs. Prasanth S. Dhananka and Ors.¹⁹ the Supreme Court observed that once the complaining party has discharged the initial burden by proving a case of negligence on the part of the hospital or the accused doctor, the burden then shifts to the hospital or the attending doctors, and it is up to them to persuade the court that there was no lack of care or diligence. In the context of expert view the Supreme Court stated in the case of Malay Kumar Ganguly vs. Sukumar Mukherjee and Others²⁰ that an expert's view must be supported by someone with exceptional expertise or understanding in the field of medicine. The court has the authority to decide whether such evidence should be included and how much weight it should be given.²¹

Legal Provisions and Medical Negligence

Civil Liability under the Consumer Protection Act

The Consumer Protection Act of 2019 seeks to efficiently address consumer issues while safeguarding their interests. Everyone of India is subject to the Act The Consumer Protection Act of 2019's Section 2(7) (ii) defines the term "consumer" in the Acts, "who hires or uses any services for compensation paid or agreed or partly paid and partly promised or under any delayed payment scheme and includes any beneficiary of such services other than the individual who hires or uses the services for consideration paid or promised or under any deferred payment scheme where such services are used in combination with the customer."²² Moreover, section 2(11) of the Act defines the term "deficiency," which includes "means any fault, imperfection, shortcoming or inadequacy in the quality, nature and manner of performance which is required to be maintained by or under any law for the time being in force or has been undertaken to be performed by a person in pursuance of a contract or otherwise in relation to any service."²³ In addition, the Act's section 2(42) defines what "service" means. "service of any description which is made available to potential users and includes, but not limited to, the provision of facilities in connection with banking, financing, insurance, transport, processing, supply of electrical or other energy, telecom, boarding or lodging or both, housing construction, entertainment, amusement or the purveying of news or other information, but does not include the rendering of any service free of charge or under a contract of personal service."²⁴

A party who feels wronged may take the accused and the hospital to court in a case against them. The Supreme Court made the following observation in Indian Medical Association v. V.P. Santha²⁵ that because the Consumer Protection Act of 1986 has been superseded by the Consumer Protection Act of 2019, medical practitioners shall be viewed as providing services under section

¹⁴ Petition No. 116 of 1991

¹⁵ "What Is Informed Consent?", Last Revised: May 13, 2019, [Informed Consent | What Is Informed Consent? \(cancer.org\)](https://www.cancer.org/what-is-informed-consent/), Last visited: March 5, 2023.

¹⁶ AIR 1987 Ker 52.

¹⁷ Rateesh Sareen and Akanksha Dutt, "Informed Consent in Medical Decision Making In India", Journal of Counselling and Family Therapy Volume 1 Issue 1.

¹⁸ Dr. R.K Bangia, Law of Torts, chapter-11, Page-246, 24th ed. 2017.

¹⁹ Civil Appeal No. 4119 of 1999.

²⁰ AIR 2010 SC 1162.

²¹ Hitansh Sharma, "Medical Negligence and the Law", Ipleaders, Published on: April 2, 2019, [Medical Negligence and the Law in India \(ipleaders.in\)](https://www.ipleaders.in/medical-negligence-and-the-law/), Last visited: March 14, 2023.

²² THE CONSUMER PROTECTION ACT, 2019 ACT NO. 35 OF 2019.

²³ THE CONSUMER PROTECTION ACT, 2019 ACT NO. 35 OF 2019.

²⁴ THE CONSUMER PROTECTION ACT, 2019 ACT NO. 35 OF 2019.

²⁵ 1995 SCC (6) 651.

(1)(o) of the 1986 Act while providing medical services. As a result, the scope of services in section 2 (42) applies to medical services delivered under the new Act. Every occurrence of medical negligence on the part of the service provider must be recognised as a shortcoming, in accordance with section 42(11) of the new Act.

Medical Negligence as a Tortious liability

When the Consumer Protection Act or other civil laws expire, the law of torts takes over and protects the rights of patients. This implies that when a situation doesn't come within the parameters of "service" as outlined in the Consumer Protection Act, 2019, patients can legitimately demand reimbursement and seek protection under negligence under tort law. However, it is the patient's duty to establish that the doctor's reckless acts caused them harm. Performing surgery on the incorrect part of the body, leaving something in the patient's abdomen after surgery, improperly sterilising the area, removing organs without the patient's consent, and prescribing incorrect medications that cause allergies or unintended reactions in the patient's body are a few examples of instances of negligence.²⁶

In the *Jacob Mathew v. State of Punjab*²⁷, where the patient who was in the final stages of cancer died due to the lack of an oxygen cylinder, the complainant, the patient's son, claimed that the doctor lacked the necessary training and expertise to treat the patient whom he agreed to treat, which led to the death of his father. The Supreme Court ruled that because the victim's death at the hospital was caused by the absence of an oxygen cylinder, the appellant was accountable under civil law and was exempt from criminal punishment. In the case of *Achutrao Haribhau Khodwa v. State of Maharashtra*²⁸, the Supreme Court determined that the *res ipsa loquitur* notion may be utilised to establish that the surgeon conducting the surgery was negligent and that the Government was vicariously accountable. Achutrao died as a result of a mop being inadvertently left within her peritoneal cavity during a sterilising treatment in a government hospital.²⁹

Medical negligence as a criminal liability

The medical practitioner is treated differently from a regular person under Indian criminal law. The level of carelessness must be higher than the level necessary to impose civil liability in order to establish criminal responsibility. *Mens rea* is a necessary factor in criminal law. To hold someone accountable, it is necessary to demonstrate a guilty mind or an evil motive. It is difficult to prove a doctor's guilty mind and willfully negligent behaviour in cases of medical negligence, whether minor or severe.³⁰

According to Section 304-A of the Indian Penal Code, 1860, "if a person commits a rash or negligent act which amounts to culpable homicide then the person will be punished with imprisonment for a term which may extend to two years or with fine or both."³¹

This means that if a person causes death of another person due to his negligent or rash behavior, he will be liable for punishment. According to Section 337 of the Indian Penal Code, 1860, "Whoever causes hurt to any person by doing any act so rashly or negligently as to endanger human life, or the personal safety of others, shall be punished with imprisonment of either description for a term which may extend to six months, or with fine which may extend to five hundred rupees, or with both."³²

According to Section 338 of the Indian Penal Code, 1860, "Whoever causes grievous hurt to any person to doing any act so rashly or negligently as to endanger human life, or the personal safety of others, shall be punished with imprisonment of either description for a term which may extend to two years, or with fine which may extend to one thousand rupees, or with both."³³

The appellant in *Juggan Khan v. State of Madhya Pradesh*³⁴ possessed a licence to practise homoeopathy as a doctor. After viewing an advertising for guinea worm treatment, a woman went to him. She grew agitated after taking the medication he recommended, and despite the administration of several countermeasures, she passed away that evening. The Indian Penal Code's Section 302 found the appellant guilty of murder. The court decided that providing dangerous drugs without enough testing and knowledge constituted a negligent act.³⁵

The Supreme Court said in the case of *State of Haryana v. Smt Santra*³⁶ In contrast to criminal law, where liability is determined by the degree of carelessness, civil law bases guilt on the damages incurred. The extent or seriousness of the offence, the character of the perpetrator, and other factors must be established in order to determine criminal liability.

In the case of *Kurban Hussein Mohammedali v. State of Maharashtra*³⁷, it was decided., "To impose criminal liability under Section 304A of IPC, it is necessary that the death should have been the direct result of a rash and negligent act of the accused, and that act must be the proximate and efficient cause without the intervention of another's negligence."

Latest Cases on Medical Negligence in India

The Kerala H.C. in *Dr. N. Ummar v. K.M. Hameed*³⁸ has held 'wrong diagnosis' to be an act of negligence, and noted that "When a person who possesses sufficient qualifications in the field, is ready to give medical advice and treatment as an expert in that field,

²⁶ Md Sahabuddin Mondal, "What is Doctor's Liability in Medical Negligence Cases?", lawcorner, Published on: July 21, 2020, [What is Doctor's Liability in Medical Negligence Cases? - Law Corner](#), Last visited: March 15, 2023.

²⁷ AIR 2005 SC 3180.

²⁸ 1996 SCC (2) 634

²⁹ Ibid.

³⁰ Neha Pandey, "Medical Negligence: Concept and Liability", legaldesire, Published on: April 13, 2021, <https://legaldesire.com/medical-negligence/>, Last visited: March 16, 2023.

³¹ Indian Penal Code, 1860 (Act no. 45 of Year 1860).

³² Indian Penal Code, 1860 (Act no. 45 of Year 1860).

³³ Indian Penal Code, 1860 (Act no. 45 of Year 1860).

³⁴ 1965 AIR 831.

³⁵ Richa Singh, "Medical Negligence in India", Ipleaders, Published on: August 3, 2019, [Medical Negligence in India: An Explained Procedure for filling suits \(ipleaders.in\)](#), Last visited: March 16, 2023.

³⁶ AIR 2000 SC 3335.

³⁷ 1965 SCR (2) 622.

³⁸ A.I.R. 2014 (NOC) 49 (Ker.).

he impliedly undertakes that he possesses all sufficient skill and knowledge for such medical advice or treatment. Such a person has a duty to diagnose the illness and to decide the treatment to be given and the proper medicines to be administered.”

In the case of Dr. Sunita Verma vs Smt. Sangita Dubey & Ors.³⁹ it was stated by Chhattisgarh State Consumer Disputes Redressal Commission “While deciding whether the medical professional is guilty of medical negligence following well known principles must be kept in view: I. Negligence is the breach of a duty exercised by omission to do something which a reasonable man, guided by those considerations which ordinarily regulate the conduct of human affairs, would do, or doing something which a prudent and reasonable man would not do.”

In the case of Vinod Jain vs Santokba Durlabhji Memorial Hospital & Anr. the Supreme Court said, “any individual approaching such a skilled person would have a reasonable expectation of a degree of care and caution, but there could be no assurance of the result. A physician, thus, would not assure a full recovery in every case, and the only assurance given, by implication, is that he possesses the requisite skills in the branch of the profession, and while undertaking the performance of his task, he would exercise his skills with reasonable competence. Thus, a liability would only come, if (a) either the person (doctor) did not possess the requisite skills, which he professed to have possessed; or (b) he did not exercise, with reasonable competence in a given case, the skill which he did possess. It was held not to be necessary for every professional to possess the highest level of expertise in that branch in which he practices.”

In the case of Dr. A.K. Gupta And Others vs State Of U.P. And Others⁴⁰, the Allahabas High Court directed that “whenever a complaint is received against a doctor or hospital by the Consumer Fora (whether District, State or National) or by the Criminal Court then before issuing notice to the doctor or hospital against whom the complaint was made the Consumer Forum or Criminal Court should first refer the matter to a competent doctor or committee of doctors, specialized in the field relating to which the medical negligence is attributed, and only after that doctor or committee reports that there is a prima facie case of medical negligence should notice be then issued to the concerned doctor/hospital. This is necessary to avoid harassment to doctors who may not be ultimately found to be negligent.”

Conclusion

According to Emerson, health is the greatest asset.⁴¹ People in a nation have a great deal of respect and faith in doctors. They actually believe that they are God. It is estimated that medical negligence causes the deaths of 5,000,000 Indians annually. Such instances demonstrate flagrant abuses of the right to health, which is a crucial aspect of the right to life protected by Article 21.⁴² So, medical professionals must reply to the statements with considerable caution. “The patients, irrespective of their social, cultural, and economic background, are entitled to be treated with dignity, which not only forms their fundamental right but also their human right,” in the Anuradha Saha decision, Justices Chandramauli K.R. Prasad and V. Gopala Gowda wrote. Doctors are therefore required to carry out their duties with effort and care, without engaging in any malpractice or negligence.

So, it is reasonable to conclude that, while doctors are regarded as Gods by patients, and patients have entire faith in doctors to treat them of their ailments, there may be instances of doctor carelessness. Physicians, like everyone else, make mistakes. However, if the errors are of the type that pose grave concerns for the patients, such as death or permanent deformity, then the patients' rights against carelessness must be exercised.

Suggestions

So, I would like to propose that the Medical Council of India be reinforced and given additional authority, including the establishment of a separate investigation mechanism, in order to enforce the many Acts and Rules that the Government of India has enacted. It is high time that a separate law for medical negligence should be enacted as cases for medical negligence are increasing on a rapid rate. In that law strict penalties shall be imposed so, that the doctors before acting negligently or carelessly think twice. Along with that Medical colleges should introduce the law on medical negligence in the syllabus of the course compulsorily. So, that each medical student is aware of the law and its consequences. This is on the part of the doctors when it comes to general public, different awareness programmes regarding the rights of patients available against the doctor should be conducted from time to time. People's health education and awareness campaigns should be organised and publicised through the media so that the average person is informed about the complexities of the human body, diseases, and treatments. This will assist in lowering the number of lawsuits brought against medical professionals. The use of equipment and medical tools in the healthcare industry should be done with care and caution since doing so might cause harm to the patient, which could result in a complaint being made against the treating physicians and other authorities. However, there is no clause that makes the companies that made the defective equipment liable for the damages. The Indian judicial system has to change in order to provide justice in situations of medical negligence, if not to prevent future suffering for the litigant. The court must impose harsh penalties on anyone found guilty of medical negligence, as well as significant fines on hospitals that employed such incompetent doctors.

³⁹ Dr. Sunita Verma vs Smt. Sangita Dubey & Ors. on 8 April, 2015.

⁴⁰ Dr. A.K. Gupta And Others vs State Of U.P. And Others on 12 October, 2018, Case no. No. - 4226 of 2005.

⁴¹ <https://wisdomquotes.com/health-quotes/>.

⁴² Nearly 50 Lakh Indians Die Due To Medical Negligence Every Year In Different Hospitals, Indiatimes, Published on: Jul 02, 2019, [Nearly 50 Lakh Indians Die Due To Medical Negligence Every Year In Different Hospitals \(indiatimes.com\)](https://www.indiatimes.com/Health/Nearly-50-Lakh-Indians-Die-Due-To-Medical-Negligence-Every-Year-In-Different-Hospitals/), Last visited: April 11, 2023.