



Australian Government

Department of Health, Disability and Ageing

Electronic Prescriptions Data Usage Policy

Version 1.5

Date Usage Policy

April 2025

Creation date

Date Created	Date of Approval	Version	Document owner
October 2019	October 2019	V1.0	Daniel McCabe, First Assistant Secretary, Digital Health and Services Australia Branch, Provider Benefits Integrity Division

Change History

Version	Date amended	Summary of changes
V1.1	June 2020	Incorporated feedback from Ashurst legal team and general language review
V1.2	August 2020	Removal of ASL
V1.4	February 2021	Addition of ASL
V1.5	April 2025	Updated to align with amendment to Healthcare Identifiers (Active Script List) Regulations

“What data is collected as part of my electronic prescription, and how is it used and disclosed?”

Since the introduction of Electronic Prescribing, you now have the choice to receive your prescription electronically, as an alternative to a paper prescription when you are prescribed a medicine.

The collection, use and disclosure of your personal information operates slightly differently for electronic prescriptions compared to paper prescriptions. The aim of this policy is to outline how personal information and related data contained in your electronic prescription will be collected, used, and disclosed.

An electronic prescription contains the same personal information and related data as a paper prescription. It also contains some information to make electronic prescribing work, and electronic prescribing aims to improve consumer safety and to improve the efficacy of Pharmaceutical Benefits Scheme (PBS) and Repatriation Pharmaceutical Benefits Scheme (RPBS) claims. The new information that is collected in an electronic prescription is described in detail below.

Prescription data is collected by your Prescriber. It is primarily used by your chosen Dispenser to aid in the dispense and supply of medicines. The prescription data received by your Dispenser will be disclosed to various parties involved in electronic prescribing including:

- Services Australia, which will use this data when it processes the claim for a PBS/RPBS subsidy; and
- the Department of Health, Disability and Ageing and Department of Veterans' Affairs, which will use prescription and claim data to inform Government policies.

If you have made the choice to receive your prescription electronically, you also have the choice of how you wish to have your prescription(s) issued and managed. You can decide whether to:

- receive a token (barcode/QR code) for your prescription:
 - by paper, SMS or email; or
 - on a mobile application of your choice; or
- have your prescriptions added to, and manage your prescriptions using, an Active Script List (see the 'Active Script List' section below).

Note: a Glossary is included at the end of this Policy to explain the meaning of certain capitalised words such as 'Prescriber' and 'Dispenser'.

Prescribe

Your Prescriber will collect the same personal information that they collect now within their clinical system (such as your name, date of birth, address, gender, Medicare number, DVA file number or IHI, the medicine you have been prescribed, and the reason for prescribing the medicine). You will be asked to provide your consent to the collection, use and disclosure of your personal information (including clinical data) when you register for an ASL with your Prescriber (e.g. a doctor or medical practice).

On a paper prescription, only a subset of the personal information collected in the clinical system is printed on the prescription (as space on a paper prescription is limited). The personal information that is recorded on a paper prescription includes your name, address, Medicare number or DVA file number, the medicine details, and the number of repeats.

An electronic prescription differs from a paper prescription as it is possible to send more data to a Dispenser to assist them with providing you with the best health outcome. Accordingly, an electronic prescription will include more data than what is included on the paper prescription.

When your Prescriber issues you a prescription and you choose an electronic prescription, the electronic prescription will be sent to your ASL by default (if you have registered for one). If you wish for a selected prescription not to be sent to your ASL, you will need to inform your Prescriber.

An electronic prescription will include the healthcare identifier for the Prescriber's organisation (HPI-O) along with the Hospital Provider Number (HPN) or Residential Aged Care Facility ID (RACF ID), where relevant. It will also include the following information:

- your Individual Healthcare Identifier (IHI) number that has been assigned to you by the Healthcare Identifiers (HI) Service;
- your name; and
- if available, the healthcare identifier for the individual Prescriber (HPI-I).

It also may include:

- the reason for prescribing the medicine
- more detail about the medicine prescribed (the Australian Medicines Terminology code); and
- your date of birth.

As part of the electronic prescription process, you may request more information about your prescription (an Evidence of Prescription) in either paper form or through an electronic notification (e.g. via SMS, email or a mobile application). The Evidence of Prescription will include information about your prescription (e.g. name of medicine) as well as a privacy notice about the collection, use and disclosure of your personal information.)

National Prescription Delivery Service

When you receive an electronic prescription, the information contained in that prescription will be encrypted and uploaded by your Prescriber's clinical system to the National Prescription Delivery Service that is operated by Fred IT Group Pty Ltd. The National Prescription Delivery Service is a mechanism that allows your prescription to be retrieved from whichever Dispenser you choose to visit.

The National Prescription Delivery Service does not use prescription data other than to the extent necessary to operate the service which may include the need to expose unencrypted payloads internally for maintenance, fault finding, authorised investigations or by legal order.

Other than as described above, the National Prescription Delivery Service does not decrypt the electronic prescription except where a conformant dispensing or consumer facing system requires the prescription to be decrypted or when it needs to be decrypted to meet legal obligations (e.g. State or territory legislation regarding real time reporting of controlled drugs). When you receive an electronic prescription you provide your consent to your personal information (including prescription data) being sent to the National Prescription Delivery Service.

Active Script List

An Active Script List (ASL) allows you to manage your prescriptions by safely storing the tokens for your active electronic prescriptions. This removes the need for you to present your token (barcode/QR code) to have your medicines supplied. Following registration for an Active Script List, you will be able to share your list of active prescriptions with your chosen Prescribers and Dispensers. On presentation at your Dispenser, the Dispenser will use your name and other identifying information to search its electronic dispensing system and return the list of your active prescriptions. Your Dispenser will download the relevant electronic prescription to dispense the medicine that has been prescribed to you.

The Active Script List Registry Provider, Medication Knowledge Pty Ltd, adheres to all Privacy Acts and regulations in Australia with regards to appropriate and safe data and data usage.

Assisted registration

Assisted registration for an ASL is available through your pharmacy in the first instance and may be available later through your doctor as well. You will need to provide your Medicare card/DVA Card and:

- a Government issued photo identification
- other documents required to satisfy a 100-point check; or
- satisfy the requirements for the 'known consumer' model (note that the 'known consumer' model cannot be used where you are taking a Schedule 8 medicine and are not a resident of a residential aged care facility or where you are prescribed a Schedule 8 medicine).

The Dispenser will confirm or enter your details into their clinical software. In order for an ASL to be registered, the clinical software needs to obtain your Individual Healthcare Identifier (IHI). To verify your IHI, the software will use the identifying details you have provided to confirm your IHI via the Healthcare Identifiers (HI) Service.

You'll already have an IHI if you're enrolled in Medicare or have a Medicare or Department of Veterans' Affairs (DVA) card. If you're not eligible for Medicare or a DVA pension or benefit, you can still register for an IHI by submitting an application to Services Australia. The clinical system will then complete the ASL registration form with your details. The details the healthcare provider will need to record in their system to register an ASL are:

- Family name
- Given name(s)

- Date of birth
- Gender
- Medicare number or DVA number

As part of registration, you may identify a carer and/or an agent, who can manage or collect your medicines on your behalf. To register a carer/agent you will need to provide their:

- Family name
- Given name (optional if the carer or agent has only one name)
- Address (optional)
- Relationship to the consumer (optional)
- Telephone number (optional)
- Email address (optional)
- Status as a carer or an agent

An agent can collect medicines on your behalf, supplied from a pharmacy. A carer can operate your ASL on your behalf. A carer will have the same capability to manage an ASL as the consumer. For example, a parent can register and operate an ASL on behalf of their child. An organisation can also be added as a carer. When adding an agent or carer, the Dispenser will ask the carer or agent whether they consent to their details being added to the ASL. The Dispenser will capture any consent in their clinical system.

You or your carer will receive a text message or email prior to completing the registration process, to obtain your consent to register for an ASL. The electronic notification will include a link to the Terms & Conditions and privacy policy relating to your ASL. By responding to the text message, you consent to providing all of your active electronic prescription data to the Active Script List Registry Provider and the Dispenser assisting with your registration.

In order to populate your Active Script List, the Active Script List Registry Provider needs to access your active electronic prescriptions and electronic copies of paper prescriptions which are held by the National Prescription Delivery Service and decrypt, aggregate and display a subset of the data in your Active Script List. The Active Script List Registry Provider will only use your registration data and IHI for the purposes of creating and managing your Active Script List, and will not disclose your data to anyone other than those specified in the Active Script List Registry Provider's terms and conditions.

Please note that any person whom you have granted access to your Active Script List will be able to view all your active prescriptions, unless you withdraw your consent. If you wish to not have a certain prescription appear on your Active Script List, you can ask the Prescriber not to send the prescription to your Active Script List when they issue you a prescription.

You will need to provide your consent via SMS confirmation whenever a Prescriber or a Dispenser requests to access your Active Script List, unless you have already granted access and that access right is still current (that is, you have not revoked your consent). If you wish to revoke access rights you have

granted to a Prescriber or Dispenser, you can do so with assistance from a Dispenser or the Active Script List Registry Provider.

A Prescriber or Dispenser with access to your Active Script List will only access the data in your Active Script List when instructed to do so by you or your carer/agent.

ASL self-registration

In addition to the assisted registration method outlined above, you can also self register for an ASL using a mobile application under ASL – Release 2.

If you wish to self-register to access an ASL you will need to provide the following information to a mobile application service provider:

- Family name
- Given name(s)
- Date of birth
- Gender
- Medicare number or DVA number
- Proof of identity will be provided through a trusted authentication provider

You may, if you are in possession of it, disclose your IHI to the mobile prescription application service provider as part of the self-registration process.

You may also identify a carer and/or an agent, who can manage or collect your medicines on your behalf. To register a carer/agent you will need to provide to the mobile prescription application service provider their:

- Family name
- Given name (optional if the carer or agent has only one name)
- Address (optional)
- Relationship to the consumer (optional)
- Telephone number (optional)
- Email address (optional)
- Status as a carer or an agent

Your details will be collected by the mobile application and shared with mobile intermediary, which provides connection services for mobile applications to facilitate electronic prescriptions. The information you provide will also collected, used and disclosed by the HI Service and the Active Script List Registry Provider.

The purpose for collection, use and disclosure of the information you provide is for your IHI to be obtained or validated (where you provide your IHI as part of the ASL self-registration process). An ASL can only be created with a valid IHI.

Mobile applications

At the point of receipt of an electronic prescription, you may decide to send your electronic prescription token (barcode/QR code) to a mobile application. When registering for the mobile application of your choice, you will be required to

consent to allowing the entity that provides the mobile application to collect, use and disclose your personal information (including prescription data) for the purpose of providing mobile application functionality.

When self-registering for an ASL using a mobile application, you will be required to consent to allowing the entity that provides the mobile application and the mobile intermediary the mobile application to collect, use and disclose your personal information (including prescription data) for the purpose registering for the active script list.

Mobile applications are operated by non-government entities, and [a list of mobile application operators](#) can be found here.

Dispense

Your Dispenser will collect mostly the same data as they collect now for paper prescriptions to dispense and supply medicine from an electronic prescription. There are some additional data elements collected with an electronic prescription.

When your Dispenser dispenses your medicine, they will upload a dispense record to the National Prescription Delivery Service (NPDS). This record includes information about what was dispensed, such as the brand and medicine. This dispense record is available to the Dispenser you choose for any subsequent repeats.

The Dispenser may disclose data (including the Australian Medicines Terminology code for the dispensed medicine and the healthcare identifier data for the Dispenser) to Services Australia. This disclosure is required as part of the process of making a PBS/RPBS claim. This data is referred to in the privacy notice that is given (in the Evidence of Prescription referred to in the 'Prescribe' section) with the electronic prescription at the time of prescribing.

New fields have been added to the claims process for electronic prescriptions, including the new fields described above for prescribe and dispense in addition to an acknowledgment that you have received the medicine (a 'receipt flag' replaces the signature that you are currently required to provide on a paper PBS prescription).

The Dispenser must keep records of your prescription and the dispense of the medication in line with Commonwealth and State and Territory legislation. For paper prescriptions, the Dispenser retains the physical paper prescription or an electronic copy of the paper prescription, as required by Commonwealth and State and Territory law. For electronic prescriptions, the Dispenser will retain the electronic prescription or a copy of the electronic prescription and dispense record, as required by Commonwealth and State and Territory law. This retention of records is referred to in the privacy notice that is provided to you at the time of the electronic prescription is issued to you by your Prescriber (in the Evidence of Prescription as mentioned in the 'Prescribe' section).

If you choose to use an online pharmacy, you will be required to consent to the pharmacy collecting, using and disclosing your prescription and personal information as part of agreeing to their terms of use.

Hospitals and other Healthcare Settings

Hospitals will also be able to use electronic prescriptions. You will be required to consent to the hospital collecting, using and disclosing your personal information (including prescription data) as part of your admission paperwork.

Residential aged care providers

Residential aged care providers will also be able to use electronic prescriptions. As a residential aged care consumer, you can consent to the provider having access to your personal information (including prescription data), but you also have the choice to continue to manage your own prescriptions.

Services Australia

As mentioned in the 'Dispense' section, Services Australia collects your personal information (including prescription data) to administer a PBS/RPBS claim. Your Dispenser provides you with your PBS/RPBS subsidy at the point of receipt of your medicine, and the Dispenser later sends the PBS/RPBS claim data to Services Australia to be reimbursed.

The PBS/RPBS claim data has changed for electronic prescriptions and new data fields have been added. These include the data fields described in the Dispense and Prescribe sections above, along with data about the software that is used to issue and process an electronic prescription.

Further, the HI Service, which that is operated by Services Australia, collects the following information from you where you seek to register for an ASL for the purpose of obtaining or verifying your Individual Healthcare Identifier (IHI):

- Family name
- Given name
- Date of birth
- Gender
- Medicare number or DVA number
- IHI (where you have provided it as part of self-registering for an ASL)

As per Australian Privacy Principle 6, the HI Service will only use or disclose a patient's personal information for the particular purpose for which is collected - known as the primary purpose. Exceptions to this include circumstances where the patient consents to a secondary use or disclosure or the patient reasonably expects the secondary use of information is related to the primary purpose of collection.

As per Australian Privacy Principle 11 (APP 11), the HI service must take measures to ensure the security of a patient's personal information and to consider whether it is permitted to do so. The HI Service must take reasonable steps to de-identify or destroy personal information it holds once the personal information is no longer required.

An exception to the APP11 notes that the above requirement does not apply where personal information collected by the HI Service forms part of a Commonwealth record, the HI Service is legally required to retain this information even in circumstances where it no longer needs the information.

Department of Health, Disability and Ageing

Services Australia provides de-identified PBS and RPBS claim data to the Commonwealth Department of Health, Disability and Ageing. The Department of Health, Disability and Ageing cannot identify consumers from the claims data it receives, but uses the data to inform health policies and health technology assessments.

Department of Veterans' Affairs

The Department of Health and Aged Care provides RPBS claims data to the Department of Veterans' Affairs (DVA). DVA uses the data to inform policies and improve the RPBS.

More information

You can obtain further information about electronic prescriptions (including the use of your personal information) by contacting us via one of the methods described below:

Department of Health, Disability and Ageing: ePrescribing@health.gov.au

Australian Digital Health Agency: help@digitalhealth.gov.au

Services Australia: otsliaison@humanservices.gov.au.

Glossary

Term (and acronym)	Definition
Active electronic prescription	An electronic prescription which is not expired (due to the expiry date passing), not exhausted (i.e. has at least one repeat remaining) and not cancelled.
Active Script List or ASL	A list of an individual's active electronic prescriptions that the individual has consented to appearing in the ASL. The Active Script List is activated through registration by an individual and allows the individual to manage their electronic prescriptions without the individual having to present tokens (barcodes/QR codes).
De-identified data	Data which has had personal information removed so that it cannot be traced back to an individual.
Dispenser	A clinician who is permitted to dispense medicines under Commonwealth and State or Territory law. Dispensers include pharmacists, medical practitioners and hospital authorities.
Individual Healthcare Identifier (IHI) number	A unique number assigned to an individual by the Healthcare Identifiers Service managed by the Chief Executive Medicare. An IHI is connected to an individual's Medicare or Department of Veterans' Affairs (DVA) card number.
PBS	Pharmaceutical Benefits Scheme.
Prescriber	A clinician who is permitted under Commonwealth and State or Territory law to prescribe a medicine. Prescribers include general practitioners, specialists, dentists, and allied health professionals based in community, residential care and hospital settings.
RPBS	Repatriation Pharmaceutical Benefits Scheme.
Token	A token is a method of retrieving an electronic prescription. It contains a barcode or QR code which represents the prescription identifier. The barcode or QR code allows scanning by a Dispenser to

Term (and acronym)	Definition
	retrieve the electronic prescription from a prescription delivery service.