



**Australian Government**

**Department of Health**

# **Electronic Prescriptions Data Usage Policy**

**Version 1.4**

**Data Usage Policy  
February 2021**

## Change history

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Document owner	Daniel McCabe, First Assistant Secretary, Digital Health and Services Australia Branch, Provider Benefits Integrity Division
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Summary of changes	Removal of ASL
Version	1.2
Date amended	January 2021
Summary of changes	Addition of ASL
Version	1.4

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

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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 to improve patient 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 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**

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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 or DVA file number, the medicine you have been prescribed, and the reason for prescribing the medicine). You are asked to provide your consent

to the collection, use and disclosure of your personal information (including clinical data) when you register 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 to provide you with the best health outcome. Accordingly, an electronic prescription will include more data than 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 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.

## Prescription delivery service

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When you receive an electronic prescription, the information contained in that prescription will be encrypted (locked) and uploaded by your Prescriber's clinical system to a prescription delivery service that is operated by non-government entities (a list of prescription delivery services can be found [here](#)). The prescription delivery service is a mechanism that allows your prescription to be retrieved from whichever Dispenser you choose to visit.

The prescription delivery service does not use prescription data other than to the extent necessary to operate the service. It does not decrypt (unlock) the electronic prescription unless consent has been provided by you, or unless compelled to by law (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 a prescription delivery service.

## Active Script List

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An Active Script List 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.

Assisted registration, where a dispenser or prescriber help you to set up your registration, will be available through your pharmacy in the first instance and may be available later through your doctor as well. You will need to provide identification documents to meet a 100 point check. The identification documents need to be current, and must include a government issued photo identification, your Medicare card/DVA Card and any other document required to satisfy the 100 point check.

The healthcare provider 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 Individual Healthcare Identifier (IHI) via the Healthcare Identifiers (HI) Service. You'll already have an IHI if you're enrolled in Medicare or Department of Veterans' Affairs (DVA). 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
- Date of birth
- Gender
- Medicare number or DVA number

As part of registration, you will also be able to 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 patient (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 patient. 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 healthcare provider will ask the carer or agent whether they consent to their details being added to the ASL. The healthcare provider 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 an Active Script List Registry Provider and the healthcare provider 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 prescription delivery service and decrypt, aggregate and display a subset of the data they hold. This aggregated view will become your Active Script List. The Active Script List Registry Provider will only use your registration data and active prescription data 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 healthcare provider 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

## Mobile applications

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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.

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

## Dispense

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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 prescription delivery service. 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 will 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**

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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**

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Residential aged care providers will also be able to use electronic prescriptions. As a residential aged care patient, 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**

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As mentioned in the 'Dispense' section, Services Australia collects your personal information (including prescription data) in order 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.

## **Department of Health**

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

## Department of Veterans' Affairs

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

### More information

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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: [ePrescribing@health.gov.au](mailto:ePrescribing@health.gov.au)

Australian Digital Health Agency: [help@digitalhealth.gov.au](mailto:help@digitalhealth.gov.au)

Services Australia: [otsliaison@humanservices.gov.au](mailto:otsliaison@humanservices.gov.au)

## Glossary

<b>Term (and acronym)</b>	<b>Definition</b>
<b>Active electronic prescription</b>	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.
<b>Active Script List or ASL</b>	A list of all of an individual's active electronic prescriptions. The Active Script List is activated through registration by an individual, and allows the individual to manage their electronic prescriptions without using tokens (barcodes/QR codes).
<b>De-identified data</b>	Data which has had personal information removed so that it cannot be traced back to an individual.
<b>Dispenser</b>	A clinician who is permitted to dispense medicines under Commonwealth and State or Territory law. Dispensers include pharmacists, medical practitioners and hospital authorities.
<b>Individual Healthcare Identifier (IHI) number</b>	A unique number granted 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 Veteran's Affairs (DVA) card number.
<b>PBS</b>	Pharmaceutical Benefits Scheme.
<b>Prescriber</b>	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.
<b>RPBS</b>	Repatriation Pharmaceutical Benefits Scheme.
<b>Token</b>	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 retrieve the electronic

	prescription from a prescription delivery service.
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