

# Pharmaceutical professions and QScript

*Medicines and Poisons Act 2019 – December 2022*

## Access to QScript

Currently, the only pharmaceutical professionals authorised under the Medicines and Poisons (Medicines) Regulation 2021 (Qld) (MPMR) to access QScript are health practitioners registered with the Australian Health Practitioner Regulation Agency as a pharmacist holding:

- **general** registration
- **limited** registration
- **provisional** registration.

Pharmacists holding **non-practising** or **student** registration are not authorised to access QScript.

**Trainee pharmacists** and **pharmacy assistants** are also not authorised to access QScript.

Under the [QScript 'Terms of Access and Use'](#) (which health practitioners agree to when registering for QScript), QScript users must keep their QScript login details and password confidential and must not disclose them to any other person.

## Requirement to check QScript

In accordance with section 41 of the *Medicines and Poisons Act 2019* (Qld) (MPA), 'relevant practitioners' are required to check QScript before:

- **prescribing** a monitored medicine for a person;
- **dispensing** a monitored medicine for a person; or
- **giving a treatment dose** of a monitored medicine for a person.

'Relevant practitioners' required to check QScript are specified in [Schedule 18, Part 1](#) of the MPMR, and include **pharmacists** and **intern pharmacists**.

Relevant practitioners who must, under [section 41](#) of the MPA, check QScript before prescribing, dispensing or giving a treatment dose of a monitored medicine, **cannot** delegate this action to another person, including another pharmacist, a 'trainee pharmacist' or a 'pharmacy assistant'.

In accordance with section 41(3) of the MPA, the requirement to check QScript does not apply if the relevant practitioner has a **reasonable excuse**; or if the monitored medicine dealing happens in circumstances prescribed by regulation to be **exempt** from the requirement.

- Reasonable excuses are determined on a case-by-case basis.
- There are currently no exemptions prescribed in the MPMR.

## Meaning of 'dispense'

Under section 25 of the MPA, 'dispense', a medicine, means *sell the medicine to a person on prescription*.

- From a practical perspective, 'dispense' in this context refers to the actual 'point of sale' of the medicine and the 'dispensing event' is understood to include all the steps leading up to the sale e.g. selecting the medicine, labelling the medicine.
- In order to comply with section 41 of the MPA, the dispensing pharmacist must check QScript prior to selling / attempting to sell the monitored medicine on prescription.

If multiple pharmacists are involved in a dispensing event, it is the dispensing pharmacist at the 'point of sale' who is required to check QScript in accordance with section 41 of the MPA.

## Dispensing multiple monitored medicines in one consultation

### Checking QScript

In instances where a pharmacist/intern pharmacist is dispensing multiple monitored medicines to one individual in a single consultation, the pharmacist/intern pharmacist is only required to check QScript once to comply with their obligations under section 41 of the MPA. That is, as long as the pharmacist/intern pharmacist has checked QScript prior to dispensing the first monitored medicine, they are not required, under the MPA, to check QScript before dispensing subsequent monitored medicine prescriptions during that single consultation.

### Red and amber notifications in QScript

From a technical point of view, the ability of a pharmacist/intern pharmacist to 'dismiss' red and amber QScript notifications generated during the checking process, will depend on how the dispensing software and clinical software provider has implemented QScript notifications in their system.

If a pharmacist/intern pharmacist's dispensing software does not allow them to 'dismiss' red and amber notifications, and if this is a matter of concern for the dispensers, they may wish to provide feedback about this to their clinical software provider.

# Pharmaceutical professions and dispensing

## Intern pharmacists

[Schedule 9](#), Part 1, Division 3 of the MPMR defines an 'intern pharmacist' as a person who is:

- (a) registered under the Health Practitioner Regulation National Law to practise in the pharmacy profession with provisional registration; and
- (b) employed as an intern undertaking supervised practice.

An intern pharmacist is lawfully able to dispense monitored medicines if the dealing with the medicine is carried out under the supervision of a pharmacist as described in [Schedule 9](#), Part 1, Division 3 of the MPMR.

## Trainee pharmacists

A 'trainee pharmacist' is a person who is registered under the Health Practitioner Regulation National Law to practise in the pharmacy profession as a student or for training purposes, as described in [Schedule 9](#), Part 1, Division 4 of the MPMR.

A trainee pharmacist is **not authorised** to dispense monitored medicines as this dealing is not included in the table in [Schedule 9](#), Part 1, Division 4 of the MPMR.

## Pharmacy assistants

[Schedule 9](#), Part 2 of the MPMR describes the dealings authorised for a 'pharmacy assistant', which includes a:

- **hospital pharmaceutical technician:** a person who has a qualification, or statement of attainment, recognising the person has the skills and knowledge required to carry out pharmaceutical impost duties for a specific health service; and who carries out pharmaceutical impost duties for a specific health service
- **dispensary pharmacy assistant:** a person who is 16 years or more and employed at a pharmacy; and who is appropriately qualified to assist with compounding at the pharmacy
- **general pharmacy assistant:** a person who is 16 years or more and employed at a pharmacy.

Pharmacy assistants are **not authorised** to dispense monitored medicines and are limited to the activities described in [Schedule 9](#), Part 2 of the MPMR.

A pharmacy assistant may assist with some aspects of dispensing medicines under the direct supervision of a pharmacist as set out in dealings authorised for pharmacy assistants under Schedule 9, Part 2, Divisions 2 and 3 of the MPMR. However:

- certain steps of the dispensing process must be undertaken by the dispensing pharmacist (dispenser);
- the dispensing pharmacist is responsible for making a dispensing record in accordance with section 124 of the MPMR; and
- the dispensing pharmacist is responsible for checking QScript in accordance with section 41 of the MPA.

## Requirements for a dispensing record

[Chapter 4, Part 8](#) 'Dispensing medicines' of the MPMR outlines certain requirements that must be met when dispensing medicines. If these requirements are not complied with, this may mean that the dispensing is not undertaken in the 'authorised way' (as defined in section 31 of the MPA), which is an offence under section 35 of the MPA.

[Section 124](#) of the MPMR specifies the requirements for a dispensing record, including the requirement for 'the name of the dispenser' to be included in the dispensing record.

- Relevant to the pharmaceutical professions, 'the name of the dispenser' that must be recorded in the dispensing record is the name of the dispensing pharmacist.
- The name of the dispensing pharmacist must be recorded in the dispensing record, and not the name of any trainee pharmacist or pharmacy assistant who may have assisted in the dispensing event. This is because, as stated earlier, trainee pharmacists and pharmacy assistants are not authorised to dispense medicines.

Accordingly, recording a trainee pharmacist or pharmacy assistant's name as the 'dispenser' of a medicine:

- may mean the dispensing pharmacist has not complied with the requirement, under section 124(1)(a) of the MPMR, to record 'the name of the dispenser'
- may suggest the trainee pharmacist or pharmacy assistant has unlawfully dispensed a medicine
- may make it appear as though the dispensing pharmacist has not checked QScript in accordance with section 41 of the MPA
- creates data quality issues within QScript.

# Uploading monitored medicine dispensing records to QScript

## Requirement to upload dispensing records

In accordance with [section 226](#) of the MPA and [Chapter 7, Part 3](#) of the MPMR, all health practitioners dispensing monitored medicines (other than those practising in public sector hospitals) must make their monitored medicine dispensing records in dispensing software connected to a Prescription Exchange Service (PES) to ensure these records are uploaded into QScript in real-time.

This requirement applies to **all health practitioners authorised to dispense monitored medicines in Queensland** (other than those practising in public sector hospitals) i.e.

- pharmacists
- intern pharmacists (under the supervision of a pharmacist)
- medical practitioners.

## Uploading dispensing records for unregistered and compounded monitored medicines

With the exception of dispensers practising in public sector hospitals, all dispensers in Queensland must upload dispensing records for monitored medicines to QScript irrespective of whether the monitored medicine being dispensed:

- is registered on the Australian Register of Therapeutic Goods (ARTG)
- is commercially prepared or is extemporaneously compounded.

For medicines registered on the ARTG, QScript will identify whether a medicine is a monitored medicine or not, based on its Australian Medicines Terminology (AMT) code.

For unregistered and extemporaneously compounded medicines that may not be assigned an appropriate AMT code, QScript employs a keyword text-matching system to determine whether the medicine is a monitored medicine.

## Ensuring accurate QScript data

The provision of accurate data to QScript is essential to ensuring that:

- medication event records are matched to the correct patient profile
- duplicate patient profiles are not inadvertently created
- the QScript red/amber/green notification system works correctly
- practitioners are provided with alerts when a high-risk clinical scenario is identified.

Queensland Health is working with the QScript vendor to help ensure accurate, high-quality information is maintained in QScript. However, pharmacists can also help improve data quality by ensuring accurate information is uploaded into QScript.

Before completing a monitored medicine dispensing record in clinical software, it is important for dispensers to check that:

- the patient's **name** is correct – ideally this should be the name recorded with Medicare
- the patient's **date of birth** is accurately recorded – it is a requirement under section 124(1)(d)(ii) of the MPMR that the patient's date of birth is included in all monitored medicine dispensing records
- where possible:
  - the patient's **Individual Healthcare Identifier (IHI)** has been recorded and validated
  - the patient's **Medicare** and/or **Department of Veterans' Affairs (DVA)** number has been recorded.

Ensuring these key identifiers are recorded and accurate will help promote patient safety and a better QScript user experience, through improved data integrity.

## Prescriber bag purchase orders

Certain medicines are provided to prescribers without charge through the [Pharmaceutical Benefits Scheme \(PBS\)](#), allowing them to be supplied to patients free of charge in an emergency. Some prescribers may also privately purchase stock of certain medicines for use with, and/or supply to, patients. These are often referred to as 'prescriber bag' supplies.

Requests for stock of medicine for a prescriber bag, whether supplied under the PBS or not, must be made through a 'purchase order' under the MPA and the MPMR rather than through a 'prescription' [see, for example, Chapter 4, Parts 3 and 4 of the MPMR]. This does not involve prescribing or dispensing the medicines. A [purchase order template](#) can be found on the Queensland Health website.

When completing a prescriber bag purchase order, the pharmacist is *supplying* or *selling* the medicine, rather than *dispensing* the medicine for a particular patient. Some prescriber bag supplies include **monitored medicines**. When prescriber bag purchase orders are processed in dispensing software correctly, these monitored medicines records do not transmit through to QScript because they are automatically filtered out.

It is important that prescriber bag purchase orders are processed appropriately, otherwise the monitored medicine dispensing record may inadvertently flow through to QScript and make it incorrectly appear as though the prescriber has self-prescribed.

Because different dispensing software systems have different ways of recording prescriber bag purchase orders, Queensland Health is unable to provide specific advice on how to make these records in dispensing software so they do not appear as 'self-prescribed'

prescriptions. If a dispenser's software user manual does not cover this topic, the dispenser may wish to request guidance from their dispensing software vendor.

## Summary for pharmaceutical professions

	Pharmacist	Intern pharmacist	Trainee pharmacist	Pharmacy assistant
Can access QScript	✓	✓	✗	✗
Can lawfully dispense a medicine?	✓	Under the supervision of a pharmacist ✓	✗	✗
Should be recorded as the 'dispenser' on a dispensing record?	✓ If the pharmacist was the dispensing pharmacist	✓ If the intern pharmacist was the dispensing pharmacist	✗	✗

## Correcting dispensing records in QScript

### General guidance

The dispensing record information in QScript is sourced from the clinical software of dispensers and is uploaded to QScript without amendment.

If there is a transcription or data-entry error made at the source system (e.g. incorrect drug, dose or prescriber details), this incorrect information will display in QScript. If a QScript user identifies a suspected error in a dispensing record (or has questions about the record) they should contact the dispenser who made the record to clarify the issue in the first instance. To find the relevant dispenser's contact details, QScript users can click on the relevant dispensing event in QScript, and it will expand with further details.

If a data entry error is confirmed, the dispenser can correct the original record in their clinical software. The corrected information should then automatically update in QScript in real-time.

Once the correction has been made, the dispenser should check QScript to confirm the changes are displaying. If they are not displaying:

- the dispenser should contact their clinical software provider to investigate the issue in the first instance. If necessary, they may need to liaise with the relevant Prescription Exchange Service (PES) provider; and
- if the software provider and/or PES provider is unable to resolve the issue, they should contact QScript technical support on 1800 776 633 or [IT.QScript@health.qld.gov.au](mailto:IT.QScript@health.qld.gov.au)

## Correcting a dispenser name

If a QScript user has identified that details of a trainee pharmacist or pharmacy assistant have been recorded against a dispense event in QScript, this may be due to:

- the trainee pharmacist's/pharmacy assistant's name incorrectly being recorded as the dispenser of the monitored medicine; or
- the way the pharmacy's dispensing software has been configured; or
- the way information flows from the pharmacy's dispensing software through to QScript.

Please note that the presence of a trainee pharmacist's/pharmacy assistant's name on a dispense event does not necessarily mean they have accessed QScript.

Dispensing event information in QScript is sourced from the pharmacy's dispensing software; a process which is independent of QScript access.

## Trainee pharmacist's/pharmacy assistant's name has incorrectly been recorded as the dispenser

If the trainee pharmacist's/pharmacy assistant's name has incorrectly been recorded as the dispenser, it is recommended that the dispensing pharmacist review and update the relevant dispensing records in their dispensing software to ensure they include their name as the dispenser (not the trainee pharmacist or pharmacy assistant). The amendment should automatically update in QScript in real-time.

Once the correction has been made, the dispenser should check QScript to confirm the changes are displaying. If they are not displaying:

- the dispenser should contact their clinical software provider to investigate the issue in the first instance. If necessary, they may need to liaise with the relevant PES provider; and
- if the software provider and/or PES provider is unable to resolve the issue, they should contact QScript technical support on 1800 776 633 or [IT.QScript@health.qld.gov.au](mailto:IT.QScript@health.qld.gov.au)



## Problems with dispensing software configuration or data flow to QScript

If the dispensing pharmacist's name has correctly been recorded in the dispensing software as the dispenser, but incorrect information is displaying in QScript:

- the dispenser should contact their clinical software provider to investigate the issue in the first instance. If necessary, they may need to liaise with the relevant PES provider; and
- if the software provider and/or PES provider is unable to resolve the issue, they should contact QScript technical support on 1800 776 633 or [IT.QScript@health.qld.gov.au](mailto:IT.QScript@health.qld.gov.au)

## Dispensing veterinary prescriptions

### Uploading veterinary dispensing records to QScript

There is **no requirement** under the MPA or MPMR for dispensers to upload veterinary dispensing records for monitored medicines to QScript and veterinary dispensing records **should not be uploaded**.

Records held within QScript are intended to relate to the treatment of a 'person' (as described within the relevant provisions of the MPA and MPMR), and not an 'animal'.

Ordinarily, veterinary prescription dispensing records do not upload to QScript, as they are filtered out from the data feed based on the prescriber type assigned to the prescriber for the prescription (e.g. 'V' for veterinarian). However, if the correct prescriber type has not been selected for a veterinary prescription, the dispensing record may upload to QScript.

If this occurs, the dispenser should correct the dispensing record in their dispensing software by selecting the correct prescriber type. This should result in the dispensing record being automatically removed from QScript in real-time.

Veterinary dispensing records should not be uploaded to QScript, as this creates data quality issues.

# Checking QScript when dispensing veterinary prescriptions

There is **no requirement** to check QScript for the monitored medicine treatment of animals and **it is not recommended** that health practitioners voluntarily check QScript in relation to veterinary prescriptions.

Firstly, as discussed above, veterinary prescription information is ordinarily not recorded in QScript (although the occasional veterinary dispensing record may inadvertently flow through). As such, there is no clinical value in searching for an animal in QScript.

Secondly, health practitioners are authorised to access QScript to record and review information for the therapeutic treatment of **patients** (i.e. persons, not animals) or to comply with requirements under the MPA and MPMR applying to the health practitioner.

- Searching QScript for the owner or custodian of an animal (i.e. a person who is not a patient subject of therapeutic treatment with monitored medicines) is not provided for under the provisions of the MPA and MPMR.
- Importantly, the inappropriate access to, and use of, another person's information in QScript may be a breach of privacy and confidentiality legislation relevant to that person.

## QScript resources

A range of resources is available to guide health practitioners in the use of QScript, including:

- the [QScript troubleshooting guide](#)
- [QScript Help content](#)– comprehensive information to help health practitioners use QScript
- online education (including webinars and videos) available at the [QScript Learning portal](#)
- [information about the new medicines, poisons and pest management regulatory framework](#) – including links to fact sheets and supporting documents
- [general information about QScript](#).

## Contact

Monitored Medicines Unit, email: [MMU@health.qld.gov.au](mailto:MMU@health.qld.gov.au)