

Queensland Health

Pharmaceutical professions and QScript

A guide to QScript-related legislative
requirements for pharmacists and other
pharmaceutical professionals



Queensland
Government

Pharmaceutical professions and QScript - A guide to QScript-related legislative requirements for pharmacists and other pharmaceutical professionals

Published by the State of Queensland (Queensland Health), June 2024

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An electronic version of this document is available at https://www.health.qld.gov.au/_data/assets/pdf_file/0036/1196676/fs-pharmacy-professions-qscript.pdf

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1 Purpose

The purpose of this guide is to help pharmaceutical professionals understand and comply with QScript-related legislative requirements under the [Medicines and Poisons Act 2019](#) (Qld) (MPA) and subordinate [Medicines and Poisons \(Medicines\) Regulation 2021](#) (Qld) (MPMR).

The [Appendix](#) provides a high-level overview of some of the key concepts discussed in this guide.

Printed copies of this guide are uncontrolled and may not be current. To access the most up-to-date version, please visit:

https://www.health.qld.gov.au/_data/assets/pdf_file/0036/1196676/fs-pharmacy-professions-qscript.pdf

2 Access to QScript

2.1 Pharmacists

[Schedule 9, Part 1, Division 1](#) of the MPMR defines a **pharmacist** as a person who is registered under the Health Practitioner Regulation National Law to practise in the pharmacy profession but not including an intern pharmacist or a trainee pharmacist.

A pharmacist is lawfully able to dispense any medicine.

Pharmacists with current Australian Health Practitioner Regulation Agency (Ahpra) registration are able to access QScript if they hold:

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

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

Authorised use of QScript

As per the [QScript Terms of Access and Use - Health Practitioners](#) (which health practitioners agree to when registering for QScript) pharmacists must keep their QScript login details and password confidential.

Pharmacists must not disclose their login credentials to any other person or allow another person to access QScript using their credentials / QScript user profile.

For more information about permitted uses of QScript, please see the [Checking QScript](#) guide.

2.2 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 any medicine under the supervision of a pharmacist.

Intern pharmacists with current Ahpra registration are able to access QScript if they hold **provisional registration**.

Authorised use of QScript

As per the [QScript Terms of Access and Use - Health Practitioners](#) (which health practitioners agree to when registering for QScript) intern pharmacists must keep their QScript login details and password confidential.

Intern pharmacists must not disclose their login credentials to any other person or allow another person to access QScript using their credentials / QScript user profile.

For more information about permitted uses of QScript, please see the [Checking QScript](#) guide.

2.3 Trainee pharmacists

[Schedule 9, Part 1, Division 4](#) of the MPMR defines a **trainee pharmacist** as 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.

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

Trainee pharmacists are **not authorised** to access QScript.

2.4 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 imprest duties¹ for a specific health service²; and who carries out pharmaceutical imprest 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.

Pharmacy assistants are **not authorised** to access QScript.

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](#) 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.

3 Requirement to check QScript

In accordance with [Section 41](#) of the 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
- unless they have a reasonable excuse or are exempted by regulation.

¹ **Pharmaceutical imprest duties** are defined in [Schedule 9, Section 9](#) of the MPMR as 'duties related to keeping an inventory of stock of medicines possessed for a specific health service or supplied for treatment of patients of the service.'

² **Specific health service** is defined in [Schedule 9, Section 9](#) of the MPMR as 'a Hospital and Health Service or private health facility'.

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

Note that **dispense** a medicine, means *sell the medicine to a person on prescription*³.

- 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.

3.1 Reasonable excuses and exemptions

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.
- From 1 July 2024, relevant practitioners are exempted from the requirement to check QScript in the circumstances specified in [Schedule 18, Part 1A](#) of the MPMR.

3.2 Delegating QScript look-up

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 e.g. another pharmacist, a trainee pharmacist or a pharmacy assistant.

For detailed guidance on the requirement to check QScript, view the [Checking QScript](#) guide.

³ [Section 25\(2\)](#) of the MPA.

4 Requirement to upload monitored medicine dispensing records to QScript

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 delivery service 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 (dispensing under the supervision of a pharmacist)
- medical practitioners.

4.1 Recording ‘the name of the dispenser’

[Chapter 4, Part 8](#) 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 a dispensing record is the name of **the dispensing pharmacist** (i.e. the pharmacist or intern pharmacist dispensing the medicine).
- 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/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.

When making dispensing records, dispensing pharmacists must ensure their own name is recorded as the dispenser; **not** the name of another pharmacist, trainee pharmacist or pharmacy assistant who may have assisted in dispensing.

4.2 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.

4.3 Queensland Opioid Treatment Program medicines

For detailed guidance on making dispensing records for opioid dependence treatment medications dispensed under the Queensland Opioid Treatment Program, please view: [Queensland Opioid Treatment Program: A guide to key legislative requirements under the Medicines and Poisons Act 2019](#)

4.4 Prescriber bag purchase orders

4.4.1 About 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 (which are also [high-risk medicines](#)). When prescriber bag purchase orders are processed in dispensing software correctly, these records do not transmit through to QScript; they are automatically filtered out.

It is important that prescriber bag purchase orders are processed appropriately, otherwise the record may inadvertently flow through to QScript and make it incorrectly appear as though the prescriber has self-prescribed a high-risk medicine, which may be an offence under [Section 40](#) of the MPA.

4.4.2 Purchase order requirements

[Chapter 4, Part 3](#) of the MPMR outlines the obligations of health practitioners who give a purchase order for stock of a Schedule 4 or Schedule 8 medicine. [Sections 222 and 223](#) of the MPMR further specify how paper or electronic purchase orders must be written.

Additionally, from a PBS perspective, there are specific requirements for how purchase orders must be made in order for a pharmaceutical benefit to be applied. For further information about these requirements, please visit www.pbs.gov.au/browse/doctorsbag or contact the Australian Government Department of Health and Aged Care.

4.4.3 How to process prescriber bag purchase orders

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 your dispensing software user manual does not cover this topic, you may wish to request guidance from your dispensing software vendor.
- If you have consulted with your software vendor about this issue and they have advised that your dispensing software is unable to process prescriber bag purchase orders correctly, it is recommended you record the words 'Prescriber's bag' or 'Doctor's bag' in the instructions of the record you make (if doing so does not contravene any applicable technical or legal requirements e.g. dispensing software terms of use, electronic prescribing conformance requirements etc.).

4.5 Veterinary dispensing records

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.

4.6 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 works closely with the QScript vendor to help ensure accurate, high-quality information is maintained in QScript. 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.

4.7 Correcting dispensing records in QScript

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.

For guidance on how to correct errors in dispensing records, please view the [QScript troubleshooting guide](#).

5 More information

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

- the [QScript troubleshooting guide](#) – troubleshooting assistance for specific technical issues
- [QScript Help content](#) – comprehensive information to help health practitioners use QScript
- the [Checking QScript](#) guide – guidance to assist relevant practitioners in understanding and meeting their legislative requirements to check QScript
- [Queensland Opioid Treatment Program: A guide to key legislative requirements under the Medicines and Poisons Act 2019](#)
- [the QScript landing page](#)
- [information about the new medicines, poisons and pest management regulatory framework](#) – including links to fact sheets and supporting documents.

6 Contact

For further information, please contact the Monitored Medicines and Compliance Unit, Health Protection and Regulation Branch, Queensland Public Health and Scientific Services at MMCU@health.qld.gov.au

7 Version control

Version	Date	Comments
1.0	13 Dec 2022	—
2.0	21 Jun 2024	Information about QScript look-up exemptions and relevant resources added. Content covered in other published resources removed to eliminate duplication. Content restructured.

Appendix

The table below provides a high-level overview of some of the key authorisations and requirements of different pharmaceutical professionals, as described in this guide.

	Pharmacist	Intern pharmacist	Trainee pharmacist	Pharmacy assistant
Authorised to access QScript?	✓	✓	✗	✗
Can lawfully dispense a medicine?	✓	✓ Only under the supervision of a pharmacist.	✗	✗
Must upload monitored medicine dispensing records to QScript?	✓ Unless practising in a public sector hospital.	✓ Unless practising in a public sector hospital.	✗	✗
Should be recorded as the 'dispenser' on a dispensing record?	✓ Only if they were the dispensing pharmacist.	✓ Only if they were the dispensing pharmacist.	✗	✗