Special Approver Guidelines

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Description	This document outlines the responsibilities of persons appointed as 'Special Approvers' to confirm that a purchaser has appropriately managed the risks associated with the acquisition in accordance with legislation and the university procurement guidelines.

Related documents

Code of Conduct
Guidelines for Chemical Management
Chemical Risk Assessment Guide
Electrical Safety Policy
Financial Management Practice Manual - Purchasing
Health and Safety Policy
Purchasing Policy
Risk Management Guide

External Links:

Managing Risks of Hazardous Chemicals in the Workplace Code of Practice 2013
Managing Risks of Plant in the Workplace Code of Practice 2013
Radiation Safety Act (Qld) 1999
Radiation Safety Regulation (Qld) 2010
Work Health and Safety Act (Qld) 2011
Work Health and Safety Regulation (Qld) 2011

1. INTRODUCTION

The University purchasing policy requires that hazardous or licensable materials, including chemical, biological, radiation sources (apparatus and radioactive substances), drugs and poisons and genetic or biosecurity materials must not be purchased, or otherwise acquired, without verification and acceptance by a Special Approver. This guideline describes the responsibilities and tasks of persons appointed as Special Approvers.

The special approval process is integral to the online purchase request system. Where it is uncertain as to whether a particular purchase constitutes a 'hazardous or licensable material' for the purposes of this guideline, the purchase must be referred to safety@griffith.edu.au for assessment.

Purchasers of hazardous or licensable materials are required to undertake appropriate risk assessments and to observe all necessary legislative and/or licence requirements relating to the safe transport, storage, use and disposal of such materials.

2. SCOPE

The Special Approver role covers the assessment of all hazardous substances, dangerous goods, medium to high risk plant and relevant contracted services.

3. DEFINITIONS AND TERMS

Australian Code for the Transport of Dangerous Goods by Road & Rail (ADG Code) – Sets out the requirements for transporting dangerous goods by road or rail.

Chemicals of a Security Concern - Identified as being certain chemicals that could be used to make homemade explosives or toxic devices.

Chemwatch (Gold FFX) – Software used to provide safety data sheets, chemical labels and hazardous chemical registers or manifests.

GSafe – Griffith University's online system used to report incidents and register activities, inspections, training and risk assessments.

Hazardous or Licensable materials – Any material that is classified by the Global Harmonisation System (GHS) as 'hazardous' or requires a licence or other certification in order to obtain or possess.

GHS Hazardous Chemicals – Substances, mixtures and articles that may pose a risk to health if not managed. These risks may be to health or the environment.

High Risk Chemicals – Chemicals (e.g. carcinogens, mutagens, reproductive toxicants or sensitisation agents) that pose significant health risk to the person. They may also pose a significant environmental risk and damage depending on quantities stored.

High Risk Plant – Machinery, equipment and tools that present significant danger e.g. lasers and centrifuges, and/ or requires a licence to operate e.g. forklift.

Safe Work Instruction (or Safe Operating Procedure or Standard Operating Procedure) –Written procedures that instruct a person on how to complete a task or activity in the safest way possible as a result of a risk assessment being conducted on that task or activity.

Safety Data Sheet (SDS) – A document that identifies the potential hazards (health, fire, reactivity and environmental) and how to work safely with the chemical product.

Scheduled Substances – Medicines, drugs or poisons that have been classified under the *Standard for the Uniform Scheduling of Medicines and Poisons* (SUSMP).

Special Approvers – Particular individuals within the University that have a level of specialised knowledge to make a determination whether the appropriate protocols and risks have been considered and addressed in relation to purchases, and have the authority to approve these purchases.

Uni Market – The University online purchasing system for chemicals and other materials.

Workers – For the purpose of this guideline, these are staff, students (including those persons undertaking work experience, placements and practicum), volunteers, contractors, sub-contractors, outworkers, apprentices and trainees.

4. NOMINATION OF SPECIAL APPROVERS

Each Academic Group and service Element should nominate one or more Special Approvers depending on the size and complexity of sub-Elements and level of risk of work activities. Special Approvers should be nominated on the basis of the criteria guidelines listed in Table 1.

Nominations for Special Approvers are normally approved by the Group PVC, Directors of support Elements (or appropriate delegates) and informed to Head of Business Services (or appropriate delegate). Special Approvers will be enabled on the system only after the above approval has occurred.

Table 1: Special Approver Selection Criteria

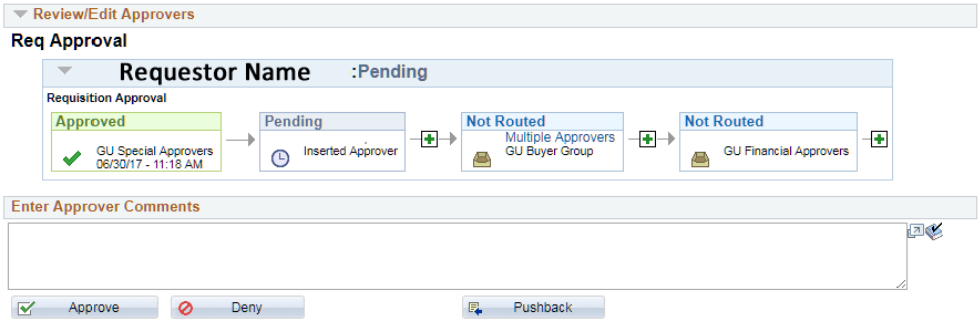
Criteria	Rationale
Relevant discipline degree	Fundamental understanding of discipline related applications, processes and implications involved in use of acquisitioned goods and services.
Significant experience in managing equipment and building infrastructure resources, awareness of organisational structure, physical facilities and work activity awareness relevant to the area.	Organisationally contextualised understanding of applications, processes and implications involved in use of acquisitioned goods and services or ability to obtain that information.
Understanding the procedures and ability to use the University procurement systems.	Ability to undertake Special Approver functions effectively.
Knowledge and ability to interpret Work, Health and Safety Act, Regulations and subordinate legislation or ability to obtain same.	Understanding of legislation and able to apply in relation to the impact of acquiring goods and services.
Knowledge of specific discipline Regulations.	Understanding of legislation and able to apply in relation to the impact of acquiring goods and services.
Ability to liaise successfully with people at all levels of the organisation and relevant external stakeholders.	Ability to facilitate resolution (if required) of processes involving acquisition of goods between client and supplier. This may require communication with a broad range of stakeholders.
Capacity to review procurement requisitions.	Time capacity to commit to review of acquisitions.
Background checks may be required for relevant items of procurement (potential legislative requirement only).	Potential legislative requirement for acquisitions involving goods or equipment of security concern.

5. SPECIAL APPROVER PROCESS

Through the procurement function, Special Approvers receive a notification email indicating requisitions are awaiting Approval on their Griffith Portal worklist.

After logging in to the Griffith Portal, the Special Approver should evaluate each request. The Special Approver Approval Checklist (refer Appendix 1) can be used as a guide to help decide if a request should be approved, pushed back or denied. If an adverse response to a checklist question is identified then the Special Approver would normally 'pushback' the request seeking further information or clarification from the requestor in the comments box. The Special Approver may also directly contact the requestor to further discuss the purchase request before making a decision.

If there is any uncertainty about the risk associated with the requisition, it should be referred to Health, Safety and Wellbeing staff at safety@griffith.edu.aufor assessment and guidance. In some cases it may be appropriate to add another approver into the process that has specialist knowledge on the equipment, material or service being requested.



Note: Procurement of hazardous substances, dangerous goods and high risk equipment must be submitted as a purchase request in accordance with the University finance system and policies. Where a corporate card is used, pre-approval from the relevant Special Approver must be obtained. Pre-approval must also be obtained from a Special Approver for any acquisition requiring reimbursement of such equipment or material. The University reserves the right to reject requests for reimbursement where prior approval has not been sought.

6. ASSESSING A PURCHASE REQUEST

6.1 Risk Management Consideration

The primary role of a Special Approver is to ensure that the risks relating to potentially hazardous equipment or materials have been assessed with appropriate control measures identified and in place. It remains the responsibility of the requestor to conduct an appropriate risk assessment. If the requestor does not provide any evidence of a risk assessment then a special approver may push-back the requisition request.

Depending on the type of equipment or material the review of a risk assessment will vary;

For frequently purchased low risk items it would be sufficient to confirm that a risk assessment has been conducted by the requestor. This could be evidenced by the provision of a GSafe risk assessment number, an attached risk assessment document, an attached Requestor Checklist or notes made in the Comments section of the purchase request. Comments may include:

- these items are non-hazardous;
- these items are hazardous and a risk assessment has been completed and approved by my supervisor.

For higher risk items it is important that the risk assessment quality is reviewed to determine if the hazards have been appropriately assessed and the controls listed are adequate. If detail or quality is lacking in the risk assessment the purchase request should be 'pushed back' to the requestor to remedy.

6.2 Equipment/Plant Considerations

For equipment and plant it is important to check that the requestor has considered installation and operating issues.

- Has the requestor confirmed that the location has sufficient capacity, access, services and appropriate operating conditions or will additional works and expense be necessary?
- Has the requestor considered the issues related to the design and construction of equipment including safe design, manufacture, and importation and supply issues?

Evidence that the requestor has sufficiently engaged with the vendor and Campus Life to determine these requirements is required. If this information is not provided the Special Approver may 'push back' the order. The requestor should also demonstrate that they have confirmed that the equipment complies with relevant standards, certifications or registrations as well as considered equipment life cycle issues such as warranty, maintenance and disposal.

6.3 Hazardous Chemical Considerations

When assessing requests for chemicals, evidence that the risk has been assessed in conjunction with a Safety Data Sheet is required. If unclear, then the Safety Data Sheet should be viewed via Chemwatch (Gold FFX). The quantity and pack sizes of the chemical should also

be checked to ensure they are consistent with the capacity limits of the storage and use locations. Some chemicals may also be classified as a scheduled substance (drug or poison), a restricted or prohibited carcinogen or a chemical of security concern. If this is the case, then compliance with licencing and other requirements must be confirmed.

6.4 Biological Material Considerations

Appropriate licences must be in place when obtaining Genetically Modified Organisms, or receiving material subject to biosecurity control Security Sensitive Biological Agents. It is also important to check that the risk group of the biological material is compatible with the physical containment level of the facilities where the material is to be handled.

If the request relates to the purchase of human or animal material then the ethics approval reference should be included in the purchase application. It is the requestors responsibility to state the relevant ethics reference in the *Comments* section of the order application. If this information is not provided, the Special Approver may 'push back' the order. In addition, if there are any known concerns around a vendor this should be discussed with the requestor before approval is granted.

6.5 Radiation Source (apparatus or radioactive substances) Considerations

There are stringent requirements relating to the acquisition of radiation sources. Normally an 'Approval to Acquire' (ATA) must be obtained prior to acquisition as well as possession and use licence requirements. A Special Approver must ensure all requirements relating to radiation have been met. The Senior Advisor (Chemical and Radiation) can provide further guidance upon request.

6.6 Organisational Considerations

It is prudent to consider broader impacts on the organisation because of the purchase.

- Could there be any implications on agreements, strategic or infrastructure planning requirements or community concerns?

6.7 Environmental Considerations

It is important to check that any environmental or sustainability implications of the purchase have been considered. An indication that energy and resource efficiencies and waste disposal have been minimised is desirable.

7. CHECKLIST

A Special Approver Approval Checklist (Appendix 1) is a tool available to assist in assessing each purchase request. For unusual or high risk requests, the Special Approver should retain an electronic copy of the checklist as a record to support their approval decision.

A Requestor Checklist (Appendix 2) is also available to assist persons making purchase requests to confirm that they have considered all the issues required by the Special Approver. Depending on the nature of the acquisition the requestor should attach a copy of this checklist to the purchase request to assist the Special Approver and minimise procurement delays.

APPENDIX 1 – SPECIAL APPROVER APPROVAL CHECKLIST FOR THE PURCHASE OF HAZARDOUS EQUIPMENT/MATERIALS

Special Approval Checklist: For the purchase of hazardous equipment or materials

This form is to be completed by Special Approvers as a record that the responsibilities of the Special Approver have been undertaken.
If an adverse response to a question is identified then the request should be 'pushed back' to the requestor or denied.

Requestor: Click here to enter text.	**Requisition Name:** Click here to enter text.	**Date:** Click here to enter text.

Category:
☐ Equipment (High risk plant or equipment) ☐ Chemical (Hazardous, Scheduled Substance, Restricted carcinogen or Gas)
☐ Biological (GMO, high risk or biosecurity material) ☐ Radiation Source (apparatus or radioactive substance) ☐ Other licensable material

Risk Management Considerations	**Yes**	**No**	**N/A**
Has a risk assessment been attached or GSafe risk assessment reference number been provided with the purchase request? Refer to: Purchase request and/or WHS Risk Register If not, justify. Click here to enter text.	☐	☐	☐
Does the risk assessment adequately address the hazards associated with the equipment or materials with appropriate controls?	☐	☐	☐
Are the controls proposed in the risk assessment implemented?	☐	☐	☐
Do the personnel currently have the capacity, competency and training required? Refer to: Certification Register	☐	☐	☐
Have there been any previous issues with the supplier nominated on the request?	☐	☐	☐
Hazardous Chemical Considerations	**Yes**	**No**	**N/A**
Are controls proposed consistent with those recommended by the Safety Data Sheet? Refer to: Chemwatch Gold FFX	☐	☐	☐
If the request is for a scheduled substance (drug or poison) or prohibited or restricted carcinogen, has the activity been registered in GSafe and any licence and/or End User Declaration requirements been met? Refer to: Lab Activity Register and/or The Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP)	☐	☐	☐
Are the quantities and pack sizes requested consistent with the allowances and capacity of the storage/use location(s)? Refer to: As built specifications (Campus Life), Hazardous Zone Assessment (if applicable) and/or Australian Standards (e.g. Flammable liquid package size <5L)	☐	☐	☐
Are appropriate controls specified, if the substance is listed as a Chemical of Security Concern? Refer to: Chemicals of Security	☐	☐	☐
Biological Material Considerations	**Yes**	**No**	**N/A**
For Genetically modified material, have appropriate licences been obtained? Refer to: Lab Activity Register , University Biosafety Committee, and/or the Gene Technology Regulator	☐	☐	☐
If the request is for a biosecurity material, has the activity been registered in GSafe? Refer to: Lab Activity Register and/or Department of Agriculture and Water Resources	☐	☐	☐
For microorganisms, has the risk group been confirmed as appropriate for the containment level, and it is not a Security Sensitive Biological Agent? Refer to: Australian Standard AS/NZS2243.3 and/or Security Sensitive Biological Agents	☐	☐	☐
Has the requestor obtained human or animal ethics approval been obtained (if relevant)? Refer to: Office for Research	☐	☐	☐
Equipment/Plant Considerations	**Yes**	**No**	**N/A**
Have installation issues been considered (including any Campus Life works) e.g. gas restraints, plumbing, ducting etc.?	☐	☐	☐
Has the requestor confirmed all registration/certification requirements (e.g. Certificate of Plant Design Registration) have been obtained where required?	☐	☐	☐
Has the requester confirmed that the equipment meets all relevant Australian Safety Standards?	☐	☐	☐
Has the requestor confirmed that the intended location for installation/use is suitable in terms of: • Location capacity? e.g. Structural capacity such as floor loading and sufficient space • Access? e.g. equipment fits through doors, suitable bench	☐	☐	☐
Has the requestor confirmed that the intended location for installation/use is suitable in terms of: • Services? (Consider: Power, Water, Sewer, Reticulated Gases, Compressed Air and Data requirements) • Ventilation? (Consider: Oxygen depletion or enrichment, Fume/air extraction, directional air-flow, Temperature, Humidity and heat load/air-con capacity/chilled water) • Note: Completion of a Space Description Form (SDF) may be appropriate	☐	☐	☐
Has the requestor considered other equipment life cycle issues including warranty, maintenance and disposal?	☐	☐	☐
Radiation Sources (apparatus or radioactive substance)	**Yes**	**No**	**N/A**
Has an Approval to Acquire (ATA) been obtained? Refer to: Lab Activity Register	☐	☐	☐
Is the source or the source type listed on the Possession Licence? Refer to: Possession Licence	☐	☐	☐
Does the Radiation Premises and/or store certification requirements include the source and/or its activity?	☐	☐	☐
Is an import permit required? Refer to: ARPANSA	☐	☐	☐
Have the ongoing licensing (sources and individuals) and certification (apparatus, premises, stores and Radiation Safety Officers) fee requirements been considered?	☐	☐	☐
Risk Management Considerations	**Yes**	**No**	**N/A**
• Have organisational impacts of the purchase been considered? Evaluate any implications on MOUs, Infrastructure planning, strategic or operational planning. • Have all environmental impacts of the purchase been considered? Check that environmental implications relating to the use or disposal of the equipment/material have been identified and mitigated (if possible). • Have all sustainability impacts of the purchase been considered? Have energy and resource use been evaluated and minimised?	☐ ☐ ☐	☐ ☐ ☐	☐ ☐ ☐

APPENDIX 2 - REQUESTOR CHECKLIST FOR THE PURCHASE OF HAZARDOUS EQUIPMENT/MATERIALS

Requestor Checklist: for the purchase of hazardous equipment or materials

This checklist will aid a purchase requestor by ensure all issues have been addressed prior to submitting a purchase request.
Inclusion of the checklist with the purchase request will assist 'Special Approvers' and minimise purchase delays.

Requestor: Click here to enter text.	**Requisition Name:** Click here to enter text.	**Date:** Click here to enter text.

Category:
☐ Equipment (High risk plant or equipment) ☐ Chemical (Hazardous, Scheduled Substance, Restricted carcinogen or Gas)
☐ Biological (GMO, high risk or biosecurity material) ☐ Radiation Source (apparatus or radioactive substance) ☐ Other licensable material

Risk Management Considerations	**Yes**	**No**	**N/A**
Has a risk assessment been attached or GSafe risk assessment reference number been provided to the purchase request? If not, justify Click here to enter text.	☐	☐	☐
Does the risk assessment adequately address the hazards associated with the equipment or materials with appropriate controls?	☐	☐	☐
Are the controls proposed in the risk assessment implemented?	☐	☐	☐
Have training requirements been met or is additional training required?	☐	☐	☐
Have there been any previous issues with the supplier nominated on the request?	☐	☐	☐
Hazardous Chemical Considerations	**Yes**	**No**	**N/A**
Are controls proposed consistent with those recommended by the Safety Data Sheet? Refer to: Chemwatch Gold FFX	☐	☐	☐
If the request is for a scheduled substance (drug or poison) or prohibited or restricted carcinogen, has the activity been registered in GSafe and any licence and/or End User Declaration requirements been met? Refer to: Lab Activity Register and/or The Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP)	☐	☐	☐
Are the quantities and pack sizes requested consistent with the allowances and capacity of the storage/use location(s)? Refer to: As built specifications (Campus Life), Hazardous Zone Assessment (if applicable) and/or Australian Standards (e.g.Flammable liquid package size <5L)	☐	☐	☐
Are appropriate controls in place, if the substance is listed as a Chemical of Security Concern? Refer to: Chemicals of Security Concern	☐	☐	☐
Biological Material Considerations	**Yes**	**No**	**N/A**
For Genetically modified material, have appropriate licences been obtained? Refer to: Lab Activity Register , University Biosafety Committee, and/or the Gene Technology Regulator	☐	☐	☐
If the request is for a biosecurity material, has the activity been registered in GSafe? Refer to: Lab Activity Register and/or Department of Agriculture and Water Resources	☐	☐	☐
For microorganisms, has the risk group been confirmed as appropriate for the containment level, and that is not a Security Sensitive Biological Agent? Refer to: Australian Standard AS/NZS2243.3 and/or Security Sensitive Biological Agents	☐	☐	☐
Has human or animal ethics approval been obtained (if relevant)? Refer to: Office for Research	☐	☐	☐
Equipment/Plant Considerations	**Yes**	**No**	**N/A**
Have all installation issues been considered (including any Campus Life works) e.g. gas restraints, plumbing, ducting etc.?	☐	☐	☐
Has all registration/certification requirements (e.g. Certificate of Plant Design Registration) been obtained where required?	☐	☐	☐
Does the equipment meet all relevant Australian Safety Standards?	☐	☐	☐
Is the intended location for installation/use suitable in terms of: • Location capacity? e.g. Structural capacity such as floor loading and sufficient space • Access? e.g. equipment fits through doors, suitable bench	☐	☐	☐
Is the intended location for installation/use suitable in terms of: • Services? (Consider: Power, Water, Sewer, Reticulated Gases, Compressed Air and Data requirements) • Ventilation? (Consider: Oxygen depletion or enrichment, Fume/air extraction, directional air-flow, Temperature, Humidity and heat load/air-con capacity/chilled water) • Note: Completion of a Space Description Form (SDF) may be appropriate	☐	☐	☐
Have other equipment life cycle issues including warranty, maintenance and disposal been considered?	☐	☐	☐
Radiation Sources (apparatus or radioactive substance)	**Yes**	**No**	**N/A**
Has an Approval to Acquire (ATA) been obtained ? Apply to: Lab Activity Register	☐	☐	☐
Is the source or the source type listed on the Possession Licence? Refer to: Possession Licence	☐	☐	☐
Does the Radiation Premises and/or store certification requirements include the source and/or its activity?	☐	☐	☐
Is an import permit required? Refer to: ARPANSA	☐	☐	☐
Have the ongoing licensing (sources and individuals) and certification (apparatus, premises, stores and Radiation Safety Officers) fee requirements been considered?	☐	☐	☐
Risk Management Considerations	**Yes**	**No**	**N/A**
• Have organisational impacts of the purchase been considered? Evaluate any implications on MOUs, Infrastructure planning, strategic or operational planning. • Have all environmental impacts of the purchase been considered? Check that environmental implications relating to the use or disposal of the equipment/material have been identified and mitigated (if possible). • Have all sustainability impacts of the purchase been considered? Have energy and resource use been evaluated and minimised?	☐ ☐ ☐	☐ ☐ ☐	☐ ☐ ☐