

Special Approver

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1.0 Purpose

This procedure outlines the requirements for requesting approval to purchase chemicals and any hazardous or licensable materials at Griffith University. The procedure aims to minimise risks to personnel and property and ensure continuing legislative compliance.

2.0 Scope

This procedure applies to all staff, students, contractors and other relevant persons engaged by Griffith University that procure, import, receive and approve the purchase of chemicals and hazardous or licensable materials, including radiation sources (apparatus and radioactive substances), medicines, poisons, and biological, genetic, or biosecurity materials.

3.0 Procedure

3.1 Nomination of Special Approvers

Accountability: Deputy Vice Chancellors, Pro Vice Chancellors or Directors

Each Academic Group and service Element must appoint at least one Special Approver to oversee the purchasing of chemicals and hazardous or licensable materials.

Additional Special Approvers may be appointed depending on the size and complexity of sub-elements and the level of risk of work activities.

Special Approvers must be nominated based on the criteria guidelines listed in Table 1.

Nominations for Special Approvers are 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 the same	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.

3.2 Requesting Special Approval

Accountability: Chemical Custodians and Biological Custodians

When placing a request for hazardous material, a Special Approver must be selected.

All high-risk chemicals and radiation purchases or acquisitions must be approved by the Senior Manager, Chemical Safety or Senior Specialist, Chemicals & Radiation, or a Special Approver independent of the group.

Purchasers of hazardous or licensable materials must undertake a risk assessment covering the intended use and observe all necessary legislative and/or licence requirements relating to the safe transport, storage, use and disposal of such materials.

Note: Procurement of hazardous substances, dangerous goods, and high-risk equipment must be submitted as a purchase request in accordance with the university's finance system and policies.

3.3 Special Approver Process

Accountability: Special Approvers

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 must evaluate each request. The Special Approver Approval Flow Chart (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 deciding.

If there is any uncertainty about the risk associated with the requisition, it should be referred to Health, Safety, and Wellbeing staff at crs@griffith.edu.au for assessment and guidance. In some cases, it may be appropriate to add another approver who has specialist knowledge of 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's finance system and policies.

Where a corporate card is used, pre-approval from the relevant Special Approver must also be obtained. No credit card purchases are permitted, with an exception for critical work, which must be approved by the Deputy Vice Chancellor or Pro Vice Chancellor.

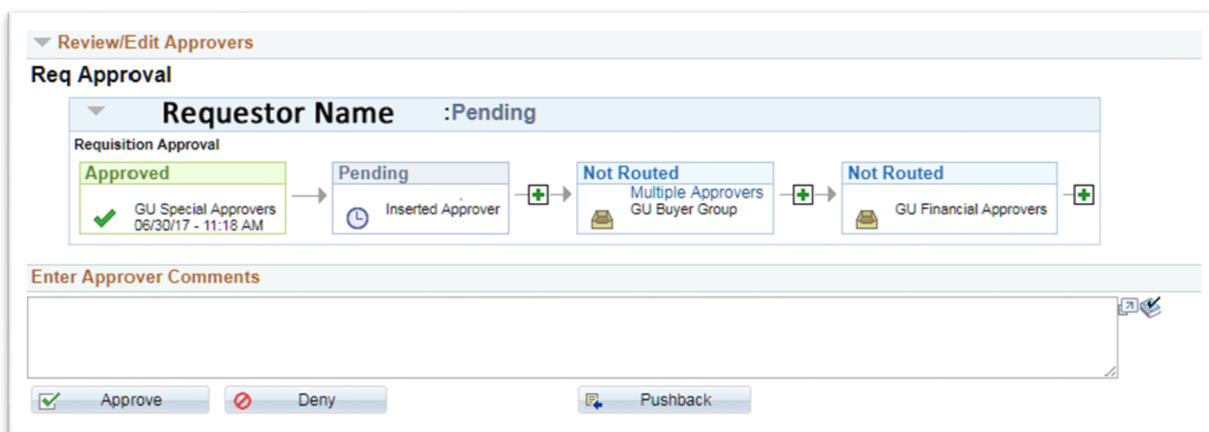
3.3.1 Assessing a Purchase Request

Risk Management Considerations

The primary role of a Special Approver is to ensure that the risks relating to potentially hazardous equipment or materials have been assessed to ensure appropriate control measures are established for the safe transports, use storage and disposal of materials. For chemicals, a Safety Data Sheet must be included with the risk assessment, otherwise approval will not be given. 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



Review/Edit Approvers

Req Approval

Requestor Name :Pending

Requisition Approval

Approved
GU Special Approvers
06/30/17 - 11:18 AM

Pending
Inserted Approver

Not Routed
Multiple Approvers
GU Buyer Group

Not Routed
GU Financial Approvers

Enter Approver Comments

Approve Deny Pushback

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 – Gsafe number.

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

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 work and expenses be necessary?
- Has the requestor considered issues related to the design and construction of equipment, including safe design, manufacture, importation, and supply?

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.

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. 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. If the chemicals are listed in the Managing Regulated Chemicals procedure, then a second level of approval is required from HSW Senior Manager Chemical Safety, HSW Senior Specialist, Chemicals & Radiation, or a special approver independent of the Group.

All high-risk or regulated chemicals must have secondary approval from any of the following:

- Senior Manager, Chemical Safety
- Senior Specialist, Chemicals & Radiation
- a Special Approver independent of the Group.

Secondary approval is required for the following chemicals; Scheduled substances (S7R, S8-9), Prohibited and Restricted Carcinogens (PaRC), Security Sensitive Ammonium Nitrate (SSAN), High-Risk, Restricted, Monitored, and Diversion Risk Medicines (HRMed), Griffith defined high-risk chemicals (GUHR), Radiation (RAD), and Controlled substances and Illicit drug precursors (CTRL).

All purchase requests must list all items on individual lines, any requests that state "as per quote" will be rejected.

Biological Material Considerations

Appropriate permits, licences or approvals must be in place prior to obtaining Genetically Modified Organisms (GMO), material covered under biosecurity control (state or federal) or material classed as Security Sensitive Biological Agents. It is also critical to ensure that the containment facility for the material has all the required certifications for storage and handling and is suitable for the material's risk group classification.

If the request relates to the purchase of human or animal material, then the relevant 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.

Radiation Source (apparatus or radioactive substances) Considerations

There are stringent requirements relating to the acquisition of radiation sources. All purchases or acquisitions must be approved by the HSW Chemical and Radiation Specialist or the HSW Senior Manager, Chemical Safety. University Radiation Safety Advisor can provide further guidance upon request.

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?

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.

3.4 Special Approver Flow Chart

A Special Approver Approval Flow Chart (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 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.

4.0 Definitions

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

Biological Material Custodians – are personnel with operational control over biological material at Griffith. This includes users of the biological material, chief investigators, and their supervisors.

Chemical Custodians – are personnel with operational control over chemicals at Griffith. This includes users of the chemicals, chief investigators, and their supervisors.

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

ChemWatch – Software used to provide safety data sheets, chemical labels and hazardous chemical registers or manifests.

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

Hazardous or Licensable materials – Substances, mixtures and articles that may pose a risk to health if not managed. These risks may be to health or the environment. They may require a licence or other certification to obtain or possess.

GHS Hazardous Chemicals – Any material that is classified by the Global Harmonisation System (GHS) as 'hazardous'.

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 Therapeutic Goods (Poisons Standard) Instrument 2023

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

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

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

5.0 Information

Title	Special Approver Procedure
Document number	2024/0001108
Purpose	This procedure outlines the requirements for requesting approval to purchase chemicals and any hazardous or licensable materials at Griffith University. The procedure aims to minimise risks to personnel and property and ensure continuing legislative compliance.
Audience	Staff
Category	Operational
Subcategory	Safety
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal: 3: Good Health and Well-Being
Approval date	4 October 2024
Effective date	4 October 2024
Review date	4 October 2029
Policy advisor	Head of H&S Systems, Wellbeing and Assurance
Approving authority	Director, Health and Safety

6.0 Related Policy Documents and Supporting Documents

Legislation	Radiation Safety Act (Qld) 1999 Radiation Safety Regulation (Qld) 2010 Work Health and Safety Act (Qld) 2011 Work Health and Safety Regulation (Qld) 2011
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Medicines and Poisons Act 2019

Medicine and Poisons Regulation 2021

Managing Risks of Hazardous Chemicals in the Workplace Code of Practice 2021

Managing Risks of Plant in the Workplace Code of Practice 2021

Policy

Code of Conduct

Health, Safety and Wellbeing Policy

Procurement and Supply Policy

Procedures

Electrical Safety Procedure

Managing Biosafety and Biosecurity Risks Standard

Managing Chemicals Standard

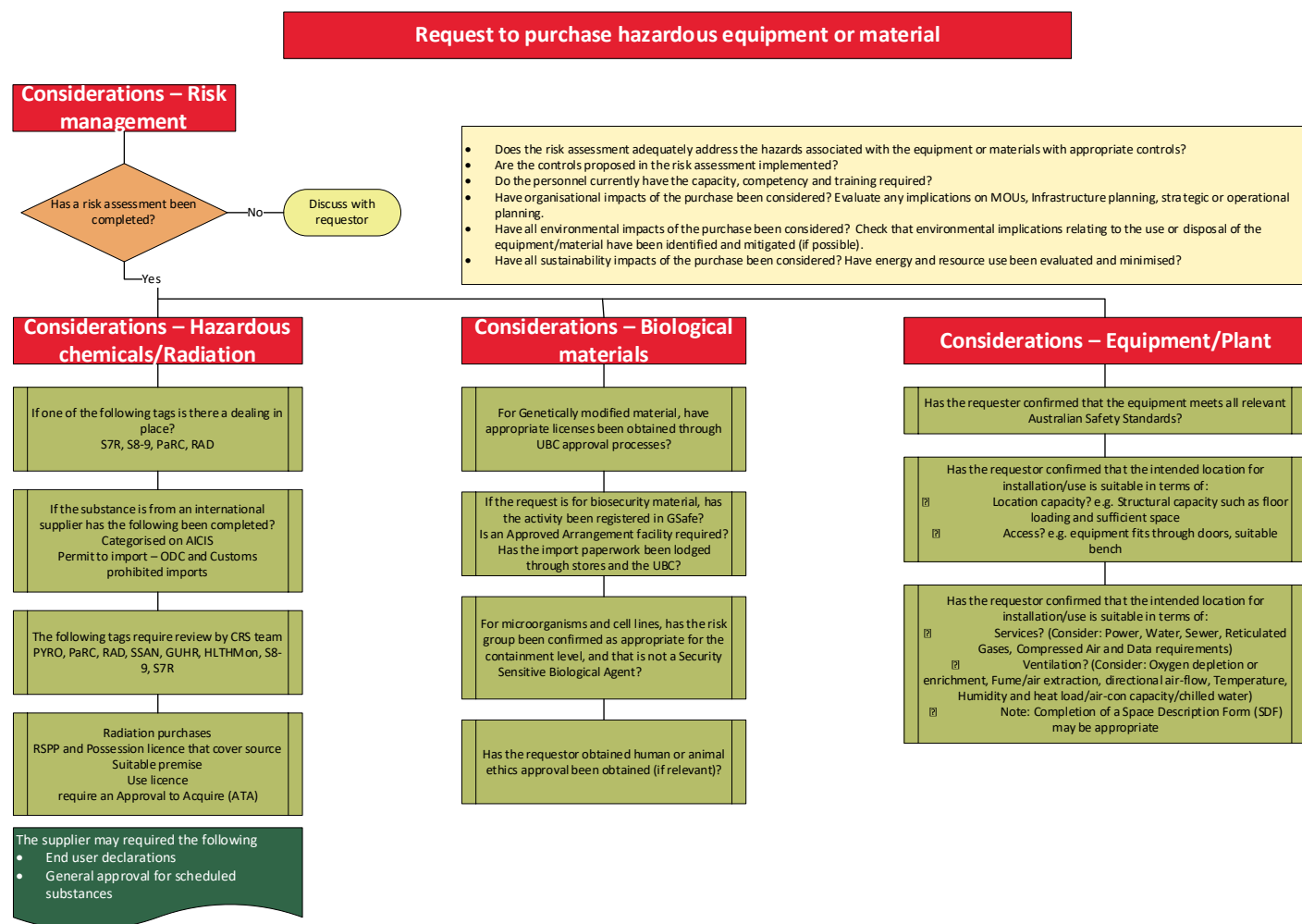
Local Protocol

N/A

Forms

N/A

Appendix 1 – Special Approver Approval Flow Chart



Appendix 2 – Requestor Checklist

 Requestor Checklist: for the purchase of hazardous equipment or materials <i>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.</i>					
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? <i>If not, justify Click here to enter text.</i>			☐	☐	☐
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? <i>Refer to:</i>			☐	☐	☐
If the request is for a Scheduled Substance (Medicine or Poison) or prohibited or restricted carcinogen, has the activity been registered in GSafe and any license and/or End User Declaration requirements been met? <i>Refer to: GSafe Activity Register and/or the Griffith University Substance Management Plan and/or Schedule 10 WHS Regulation</i>			☐	☐	☐
Are the quantities and pack sizes requested consistent with the allowances and capacity of the storage/use location(s)? <i>Refer to: As built specifications (Campus Life), Hazardous Zone Assessment (if applicable) and/or Australian Standards (e.g. Flammable liquid package size <5L)</i>			☐	☐	☐
Are appropriate controls in place, if the substance is listed as a Chemical of Security Concern? <i>Refer to: Chemicals of Security Concern</i>			☐	☐	☐
Biological Material Considerations			Yes	No	N/A
For Genetically modified material, have appropriate licences been obtained? <i>Refer to: GSafe Activity Register, University Biosafety Committee, and/or the Gene Technology Regulator</i>			☐	☐	☐
If the request is for a biosecurity material, has the activity been registered in GSafe? <i>Refer to: GSafe Activity Register and/or Department of Agriculture, Fisheries and Forestry and the Biosecurity Import Conditions database BICON</i>			☐	☐	☐
For microorganisms, has the risk group been confirmed as appropriate for the containment level, and that is not a Security Sensitive Biological Agent? <i>Refer to: Australian Standard AS/NZS2243.3 and/or Security Sensitive Biological Agents</i>			☐	☐	☐
Has human or animal ethics approval been obtained (if relevant)? <i>Refer to: Office for Research</i>			☐	☐	☐
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: GSafe	☐	☐	☐
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? Contact: crs@griffith.edu.au	☐	☐	☐
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?	☐	☐	☐