

Procurement of High-Risk Materials Guidelines

Scope and Purpose

These guidelines apply to workers; including staff, students, contractors and visitors of Monash University in Australia.

These guidelines outline the risk management requirements for procurement of high-risk materials and set out the steps for the Commodity Approval process in Coupa, should an area elect to adopt this process.

Abbreviations

OHS	Occupational Health and Safety
SARAH	Safety and Risk Analysis Hub
SDS	Safety Data Sheet
SME	Subject Matter Expert
SWI	Safe Work Instructions

Definitions

A comprehensive list of definitions is provided in the [Definitions tool](#). Definitions specific to these guidelines are provided below.

Commodity Approvers: Workers who have been assigned responsibility by the Head of Unit or a relevant Operations Manager, to approve purchase requests for high risk materials submitted in Coupa

Coupa: A cloud-based platform used at Monash University Australia to purchase goods and services from suppliers approved by Strategic Procurement.

Local Business Rules: Documented requirements and procedures established by the local area that detail the types of commodities requiring approval at a local level. Local business rules must identify the relevant information that purchasers are required to provide to support the approval of their purchase request.

High Risk Materials: Materials that require a high level of regulatory compliance and oversight, and/or those that pose a significant risk to the health and safety of workers as determined through a risk assessment.

Procurement: The process for acquiring goods and services by any means such as:

- Monash University purchasing system (e.g. Coupa)
- Corporate credit card purchase;
- Hire or loan;
- Gifts or donation;
- Trials offered by suppliers; or
- Items left by previous occupants

Purchasers: Workers who have been given responsibility and authority to purchase or procure (via other means), high risk materials for research or teaching activities in their local area.

Risk Management

1. General Requirements

- 1.1 Purchaser must ensure that a risk assessment has been completed before procuring high risk material in accordance with the [OHS Risk Management Procedure](#).
- 1.2 Areas should consider limiting the number of workers who are authorised to purchase high risk materials.
- 1.3 Purchasers should have an appropriate level of understanding of any relevant regulatory requirements and be reasonably aware of the health and safety risks associated with the materials being obtained.
- 1.4 Specific procurement requirements for high risk drugs and poisons, chemicals, biologicals and ionising radiation are set out in the following documents:
 - [High Risk Scheduled Drugs and Poisons Procedure](#);
 - [Using Chemicals Procedure](#);
 - [Using Biologicals and Animals Procedure](#);
 - [Ionising Radiation Procedure](#).

Using a locally established procurement process

2. General Requirements

- 2.1 Areas can establish their own process to manage procurement of high-risk materials.
- 2.2 The local procurement process should:
 - Be overseen by relevant subject matter experts (SMEs) who understand any applicable regulatory requirements and health and safety risks associated with the material being obtained;
 - Have a verifiable approval process to confirm that:
 - The purchaser has completed any relevant pre-purchase checklists (local or University developed);
 - A risk assessment in SARAH is available; and
 - Any relevant permits or licenses are in place.
- 2.3 The local procurement process must be documented in a procedure and the procedure must be made available to anyone who is authorised to procure high risk materials.
- 2.4 The local procedure should include:
 - A list of the high-risk materials that require approval;
 - Instructions that clearly outline the steps the purchaser is required to take to obtain approval;
 - Name or Position title of the approvers for specific materials;
 - Details of any documentation that is required to support specific types of materials (e.g. [Chemical Pre-Purchase Checklist](#), local Safe Work Instructions (SWIs), risk assessment

number in SARAH, evidence of any relevant licenses or permits, training records) – see Section 7.1 for further guidance;

- Details of any exemptions when approval is not required (e.g. recurrent purchases, standing orders; pre-approved purchases from Stores).

3. *Approvers*

- 3.1 Approvers should have an appropriate level of authority or delegation from the Head of Unit to approve or reject purchase requests.
- 3.2 Approvers should have a good understanding of the level of risk associated with the type of high-risk materials they are responsible for approving.
- 3.3 If required, Approvers should seek further advice from any relevant SMEs before approving a procurement request.

Purchasing of high-risk materials using the commodity approval process in Coupa

4. *Faculty determined commodity approval*

- 4.1 Faculties that have selected to follow this process, must establish commodity approver groups in Coupa.
- 4.2 Faculties must determine the categories of commodities that require approval and monitoring.

Schools and departments may develop local business rules to define specific requirements relating to their local operational needs, including any exemptions. For example, a department may determine, based on the level of risk, that purchasers are not required to seek approval for certain items or commodities.

5. *Establishing Commodity Approver Groups in Coupa*

- 5.1 Approver groups must be established to monitor Coupa purchases of selected commodities. Approver groups can be established at any organisational level, however approver groups set at a departmental level are recommended.
- 5.2 Heads of Unit or their delegates are required to complete the [online form](#) to request for an approver group to be set up for their area for a specified commodity.
- 5.3 Commodity Approver groups should include local Safety Officers, Specialty Safety Officers and at least one SME for the relevant materials for which purchasing approval is being sought.
- 5.4 Commodity Approver Groups can be managed locally by members of the groups. Instructions can be found on the Coupa website - [HERE](#).

6. *Approving Purchase Requests in Coupa:*

- 6.1 Commodity Approvers must review all purchase requests that are flagged for their approval in Coupa and must ensure that:
 - All the appropriate documents have been submitted in accordance with any local business rules or as set out by relevant University procedures (e.g. [High Risk Scheduled Drugs and Poisons Procedure](#)); and
 - Any relevant persons have been consulted.
- 6.2 Commodity Approvers may request that a purchaser provides any additional documentation before approving their purchase request.

7. *Determining requirements for approving purchase requests*

7.1 Local business rules need to be developed that specify the approval requirements at School/Department level. Below are some suggestions for local business rules/local procedures.

Radiation:

- Person/area/isotope/equipment is listed in local Radiation Management Plan
- Amount of isotope is within approved amount
- Risk assessment / ID number, Safety Data Sheet (SDS) and SWI are provided with the purchase request

Poisons:

- Poisons permit number is provided in the purchase request
- Amount being purchased is within the permitted amount
- Authorised person/s, as defined in the [High Risk Scheduled Drugs and Poisons Procedure](#), are placing the order
- Risk assessment / ID number and SWI is provided with the purchase request

Chemicals and transfection reagents: *this can be restricted to dangerous goods and hazardous substances only*

- Risk assessment / ID number, SDS and SWI are provided with the purchase request
 - SDS is in Chemwatch for storage location
 - Suitable storage and disposal is available (applies to Dangerous Goods and Hazardous Substances)
 - Appropriate equipment for safe handling and PPE are available (e.g. fume cupboards, respiratory protection etc.)

Gases:

- Risk assessment / ID number, SDS and SWI are provided with the purchase request Particularly for new cylinders (rather than just replacement purchases)
- Considerations are given to safe storage facilities (e.g. outside), maximum quantities that can be stored, availability of restraints, gas monitoring systems (if required) and emergency procedures in case of a leak.

8. *Submitting a purchase request in Coupa using the Commodity Approval process*

8.1 Purchasers from faculties that have elected to adopt the Coupa Commodity Approver process, will need to complete the purchase request in Coupa by following the instructions below:

Review Cart #389446 [Edit](#)

[Invite](#)

[General Info](#) [Cart Items](#) [Approvers](#) [Comments](#) [History](#)

Your requisition contains a product that requires review. Please check the "Commodity Approver Check" box before submitting your request. Refer to your local purchasing procedures and if required, add your Commodity Approver group in the Approver section. ✕

[Add Tag](#)

General Info

Created By Ashley Gardner

On Behalf Of

Additional Information

Hide Price

Attachments [Add](#) [File](#) | [URL](#) | [Text](#)

Employment Type

Special Delivery Instructions

For Winc purchases, please enter your Building, Level and Room information. For Nespresso purchases, provide your membership number. For other deliveries, only enter instructions here if required.

Commodity Approver Check

Check this box if you are from Science, Engineering, Medicine and non-faculty research platforms and you are ordering a Prescribed Commodity (see below link for more information).

Ship To

Warehouse

* Address 211B Wellington Road
MULGRAVE, VIC 3170
Australia
Location Code: ADD0009

Phone 03 9902 9450

Attention

Instructions

1. Check the **Commodity Approver Check** box to proceed. if the box is **not** checked, a red pop-up box will appear at the top – see above.
2. Add an approver group from your area for the type for commodity requiring approval.

Note: If no approver group is added, the request can still be submitted. Orders can be reviewed by the Approvers retrospectively to verify the level of compliance.

Approvers

Name Approver Position

[Cancel](#) [Add](#)

XYZ Faculty Commodity Approver Group (2 users)



Ashley Gardner



Ashley Gardner



Approval Complete

9. *Monitoring of Purchases:*

- 9.1 Areas can monitor local purchasing activities by requesting a report from the [Financial Operations team](#).
- 9.2 Finance and General Managers can monitor purchasing activities via the Finance Operations Dashboard in Power BI. They can request that other members of their team (e.g. Commodity Approvers) be granted access to the Dashboard.
- 9.3 Areas should establish a suitable process and rules whereby access to Coupa is revoked if purchasers fail to comply with the local purchasing process.

Responsibility for Implementation

A comprehensive list of OHS responsibilities is provided in the document [OHS Roles, Responsibilities and Committees Procedure](#). The specific responsibilities relating to these guidelines are summarised below.

- **Heads of Units:** It is the responsibility of the Head of Unit to ensure that there is a system in place and resources are provided to manage and monitor procurement activities for high risk materials.
- **Local OHS Committees:** It is the responsibility of local OHS committees to provide advice and feedback to Heads of Units on actions needed to comply with these guidelines.
- **Supervisors:** It is the responsibility of supervisors to ensure that these guidelines are communicated to the relevant workers in their areas.
- **Purchasers:** All staff, students, visitors and contractors of Monash University who are involved in the procurement of high-risk materials in their area, are expected to familiarise themselves with these guidelines and adhere to any relevant local procedures.

Tools

The following tool is associated with these guidelines.

- [Chemical Pre-Purchase Checklist](#)

Legislation and Related Documents

Legislation Mandating Compliance

- Occupational Health and Safety Act 2004 (Vic)

Australian and International Standards

- ISO 45001: 2018 OHS Management Systems - Requirements with guidance for use.

Monash OHS documents

- [HSW Roles and Responsibilities Procedure](#)
- [OHS Risk Management Procedure](#)
- [High Risk Scheduled Drugs and Poisons Procedure;](#)
- [Using Chemicals Procedure;](#)
- [Using Biologicals and Animals Procedure;](#)
- [Ionising Radiation Procedure](#)

Document History

Version	Date of Issue	Changes made to document
1.0	August 2024	Procurement of High-Risk Materials Guidelines v.1.0