The Uniting Church in Australia
Synod of South Australia
Resources Board

ASBESTOS MANAGEMENT POLICY

Date of Approval: 24 September 2026

Policy Owner: Resources Board

Adopted by Synod Standing Committee on 29 October 2026.

1. Purpose

This policy establishes minimum requirements for the management of asbestos-containing materials within property owned by the Uniting Church in Australia Property Trust (S.A.) ("Property Trust").

The purpose of this policy is to:

1. Support the Property Trust in meeting its property stewardship, governance and workplace health and safety responsibilities;
2. Provide a consistent approach to asbestos management across Church Property;
3. Protect workers, volunteers, contractors, members of congregations and visitors from risks associated with asbestos exposure;
4. Clearly establish Synod expectations regarding asbestos management and ensure that asbestos-related risks are appropriately identified, monitored and managed; and
5. Minimise uninsured and potentially significant financial risks arising from asbestos-related claims and liabilities.

2. Scope

This policy applies to all Church Property.

This policy applies to all Responsible Bodies, Church Councils, Committees, staff, volunteers and other persons exercising management responsibilities over Church Property.

3. Definitions

Asbestos	Naturally occurring mineral fibres regulated under applicable workplace health and safety legislation.
Asbestos-containing material (ACM)	Material or product containing asbestos.
Asbestos Professional	A person with relevant asbestos-specific qualifications, training and professional experience appropriate to the task being undertaken. This may include a licensed asbestos assessor, occupational hygienist with demonstrated asbestos assessment experience, or another appropriately qualified asbestos professional.

Asbestos Register	A register identifying known or presumed asbestos-containing materials within a property.
Asbestos Management Plan	A documented plan describing how asbestos risks will be managed.
Church Property	Any building, structure or improvement held in the name of the Uniting Church in Australia Property Trust (S.A.).
Licensed Asbestos Assessor	A person holding a current asbestos assessor licence under applicable work health and safety legislation. A current register of licensed asbestos assessors is maintained by SafeWork SA
Property Trust	The Uniting Church in Australia Property Trust (S.A.).
Responsible Body	A body responsible for management and administration of property in accordance with the Uniting Church Regulations.

4. Policy Principles

1. The Property Trust is committed to maintaining property in a manner that protects the health and safety of workers, volunteers, contractors, occupants and visitors.
2. Compliance with Workplace Health and Safety legislation is essential.
3. Asbestos risks are most effectively managed through early identification, accurate record keeping and ongoing monitoring.
4. The Property Trust, as legal owner of Church Property, may establish asbestos management standards that exceed legislative minimum requirements where considered appropriate for governance, risk management or property stewardship purposes.
5. Specialist professional advice and services shall be utilised where asbestos expertise is required by legislation and/or this policy.
6. Asbestos management requirements should be clearly documented and readily available to those responsible for managing Church Property.
7. Responsible Bodies are expected to proactively manage asbestos risks and maintain appropriate records, inspections and reviews without reliance upon Synod intervention.
8. Asbestos-related liabilities may not be fully insured and therefore represent a potentially significant financial risk to Responsible Bodies and the Property Trust.
9. Asbestos-related works must only be undertaken in accordance with applicable legislation and this policy.

5. Requirements of the Responsible Body

1. <u>Asbestos Registers and Management Plans</u>

Policy Statement:

An Asbestos Register and Asbestos Management Plan shall be maintained for Church Property where asbestos-containing materials are known or presumed to be present, unless exempt under section 5.2 of this policy. Where asbestos or ACM is required to be identified or assessed for the purpose of establishing an Asbestos Register, the identification and assessment shall be undertaken by an Asbestos Professional.

An Asbestos Management Plan shall be prepared having regard to the Asbestos Register and applicable work health and safety requirements.

Rationale:

Accurate asbestos information assists Responsible Bodies to identify asbestos risks and meet their obligations to workers, volunteers, contractors and visitors.

Registers and management plans provide an important record of known and presumed asbestos-containing materials and assist in preventing inadvertent disturbance during maintenance, refurbishment or demolition activities.

2. Exemptions from Asbestos Register Requirements

Policy Statement:

An Asbestos Register is not required where the workplace is a building constructed after 31 December 2003, no asbestos or ACM has been identified at the workplace, and no asbestos or ACM is likely to be present from time to time.

Where a workplace is not exempt from the requirement to maintain an Asbestos Register and an inspection has confirmed that no asbestos or ACM is identified or likely to be present, the Asbestos Register shall record that finding.

An Asbestos Management Plan is required where asbestos or ACM is identified or likely to be present at the workplace.

Supporting documentation must be retained by the Responsible Body and provided to Synod Property Services for record-keeping purposes.

If subsequent building works, investigations or other information identify known or presumed asbestos-containing materials, an Asbestos Register and Asbestos Management Plan shall be established in accordance with legislative requirements and this policy. Where requirements differ, the higher standard shall apply.

3. Five-Yearly Reviews

Policy Statement:

Where an Asbestos Register and Asbestos Management Plan are required, they shall be reviewed and updated at least every five years by an Asbestos Professional.

Where there is uncertainty as to whether a proposed person meets the definition of an Asbestos Professional, approval shall be obtained from Synod Property Services before the review is undertaken.

Examples may include a retired or former licensed asbestos assessor, occupational hygienist with demonstrated asbestos assessment experience, or another appropriately qualified asbestos professional who is considered by Synod Property Services to have equivalent knowledge and skills.

General building, construction, farming, maintenance or property experience, without demonstrated asbestos-specific qualifications or professional experience, will not be considered sufficient for this purpose.

Approval shall be at the discretion of Synod Property Services, apply only to the particular five-yearly review, and does not constitute ongoing recognition of the person's competency.

Reviews are not required for properties that are exempt under section 5.2 of this policy.

Additional reviews shall be undertaken whenever:

- asbestos-containing materials are removed, repaired, enclosed or disturbed;
- deterioration or damage is identified;
- new asbestos-containing materials are identified; or
- refurbishment or demolition works require updated information.

Rationale:

While the legislation does not *expect* routine reviews to be undertaken by an Asbestos Professional, the Property Trust has determined that five-yearly reviews require an Asbestos Professional to provide a consistent and appropriately qualified assessment of asbestos information and reduce reliance on volunteer office bearers undertaking technical asbestos assessments.

This requirement does not prevent a suitably qualified person within a congregation or Responsible Body from undertaking the review where they meet the definition of an Asbestos Professional.

4. Annual Visual Checks:

Policy Statement:

Known or presumed ACM shall be visually checked at least annually by a person authorised by the Responsible Body for apparent signs of deterioration, damage or disturbance.

Annual visual checks shall be undertaken with reference to the current Asbestos Register and Asbestos Management Plan and are limited to materials that can be safely observed from normally accessible areas.

Annual visual checks are observational only. Persons undertaking a visual check must not disturb, test, remove, damage or otherwise interfere with known or presumed ACM, work at height, enter restricted or unsafe areas, or otherwise expose themselves to additional risk for the purpose of completing the check.

Annual visual check records shall be retained with the Asbestos Register and Asbestos Management Plan. Where an annual visual check identifies deterioration, damage or other conditions that may increase the risk of asbestos fibre release, the Responsible Body shall engage an Asbestos Professional to undertake further assessment and, where necessary, update the Asbestos Register and Asbestos Management Plan.

Rationale:

Regular visual checks assist in identifying deterioration or damage before a significant risk develops and support ongoing compliance with asbestos management obligations.

Annual visual checks undertaken by Responsible Bodies are intended to identify visible changes in the condition of known or presumed ACM. Responsible Bodies should not attempt to undertake technical assessments of asbestos risks. Where concerns are identified, specialist advice should be obtained.

Examples of Escalation Triggers:

Examples of conditions that require engagement of an Asbestos Professional include:

- cracking, breaking or fragmentation of ACM;
- evidence of friable material or material becoming friable (material that is soft, broken down or deteriorated to the point that asbestos fibres could be more easily released into the air)
- water damage affecting ACM;
- erosion, weathering or deterioration of asbestos cement products;
- exposed edges, surfaces or fibres that were not previously visible;
- impact damage from vehicles, equipment, storms or vandalism;
- evidence that asbestos-containing materials have been drilled, cut, sanded or otherwise disturbed;
- discovery of previously unidentified materials suspected to contain asbestos;
- changes to building use that may increase the likelihood of disturbance; or planned refurbishment, demolition or intrusive maintenance works.

5. Asbestos Removal and Disturbance

Policy Statement:

Volunteers, Church Council members and other persons acting on behalf of a Responsible Body must not undertake asbestos removal, remediation or disturbance activities.

Responsible Bodies must engage appropriately qualified and, where required by legislation, licensed Asbestos Professionals or contractors whenever asbestos removal, remediation or other asbestos-related works are required.

Rationale:

The greatest risk associated with asbestos arises when asbestos-containing materials are disturbed and fibres are released into the air. Asbestos-related works require specialised knowledge, procedures and controls to protect workers, building occupants and the broader community. Where asbestos-related works are required, Asbestos Professionals must be engaged to ensure legislative compliance and safe management of risks.

6. Failure to Comply:

Policy Statement:

Where a Responsible Body fails to obtain, maintain, update or review an Asbestos Register or Asbestos Management Plan as required by this policy, Synod Property Services shall arrange for the necessary inspections, assessments, registers, management plans or reviews to be undertaken on behalf of the Property Trust.

All costs associated with such work, including consultant fees, contractor costs and reasonable internal Synod administration and staff costs, shall be recoverable from the Responsible Body.

Synod shall also take compliance with this policy into account when considering applications for grants, property funding, capital works approvals, property transactions, insurance-related matters or participation in other Synod programs and services.

Where significant asbestos risks exists, Synod, through the Property Officer, may require restriction of access to part or all of a property until identified risks have been appropriately addressed.

Rationale:

The ability to recover costs ensures that compliance activities undertaken by Synod on behalf of a Responsible Body does not impose an unfunded expense on the Mission and Service Fund. Consideration of compliance within funding and approval processes also appropriately recognises the Responsible Bodies who have managed asbestos risks.

7. Refurbishment, Demolition and Maintenance Works:

Policy Statement:

Prior to undertaking refurbishment, demolition or intrusive maintenance works, Responsible Bodies must ensure that asbestos information is reviewed and provided to relevant contractors. Where required, additional asbestos investigations shall be undertaken by an Asbestos Professional before works commence. Where legislation

requires a particular activity to be undertaken by a licensed asbestos assessor or other licensed person, the appropriately licensed person must be engaged.

Rationale:

A significant proportion of asbestos incidents occur during maintenance, refurbishment and demolition activities. Current and accurate asbestos information assists contractors to manage these risks safely.

8. Provision of Information:

   Policy Statement:

   Asbestos Registers and Asbestos Management Plans must be provided to:

   - workers undertaking work on the site;
   - Synod Property Services;
   - the Property Trust; and
   - other persons as required by legislation.

9. Reporting and Compliance:

   Policy Statement:

   Responsible Bodies must provide evidence of asbestos management compliance when requested by Synod Property Services, the Property Trust or Resources Board.

   Synod Property Services may request copies of asbestos documentation, undertake compliance reviews, or seek evidence of compliance for risk management purposes.

   Rationale:

   The Property Trust has governance and stewardship responsibilities as legal owner of Church Property and requires oversight of significant property-related risks.

6. Responsibilities

1. Responsible Bodies and Church Councils:

   Responsible Bodies and Church Councils are responsible for:

   - ensuring compliance with this policy;
   - maintaining asbestos documentation;
   - arranging required visual checks, assessments and reviews;
   - ensuring contractors are provided with asbestos information;

- reporting asbestos-related incidents, risks or compliance issues to Synod Property Services;
- making appropriate financial provision within annual budgets for asbestos management, inspections, reviews and associated compliance activities; and
- providing asbestos documentation to Synod Property Services.

2. Synod Property Services:

   Synod Property Services is responsible for:

   - providing advice and guidance regarding implementation of this policy;
   - supporting and facilitating compliance with this policy;
   - maintaining policy documentation and resources;
   - reporting significant asbestos management issues to Resources Board where appropriate; and
   - retaining asbestos related documentation provided to it.

Key contacts

For further information, please contact Synod Property Services: property@sa.uca.org.au or (08) 8236 4200.