

TITLE OPERATIONS MANUAL	STANDARD INSTRUCTION 10		DEPARTMENT FIRE-RESCUE
SUBJECT: FALL PROTECTION PLAN	SECTION 29	PAGE 1 of 12	EFFECTIVE DATE January 15, 2025

I. PURPOSE

This Fall Protection Program aims to identify and evaluate [fall hazards](#) to which employees are exposed during an emergency and non-emergency operations, including but not limited to drills, building inspection, and training activities, in compliance with [CalOSHA Title 8 2320](#).

II. SCOPE

This policy shall apply to all San Diego Fire-Rescue Department (SDFD) personnel.

III. AUTHORITY

The Fire Chief authorizes this policy.

IV. POLICY

- A. Department supervisors shall identify fall hazards when possible and provide protection for employees exposed to fall hazards.
 1. Employees will bring any known or potential fall hazard to the attention of the supervisor or department.
- B. Employees on a [walking-working surface](#) with the intention of performing more than a visual inspection (performing *intended work*) with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level is to be protected from falling (except as provided in this fall protection policy).
- C. [Fall protection](#) is required if the lower level is less than 4 feet, but the employee is exposed to an additional hazard, such as moving machinery.
- D. Fall protection consists of:
 1. [Guardrail systems](#)
 2. Safety net systems
 3. Covers
 4. Personal [fall protection systems](#)
 - a. Personal fall arrest, travel restraint, or positioning systems
 5. When 1-4 above cannot be accomplished
 - a. A [Fall protection plan](#) shall be implemented
 1. For example, a designated competent person as a spotter without any other duties
- E. Exceptions
 1. OSHA General Industry regulations do grant specific exceptions that include, but are not limited to:
 - a. During pre-work or post-work inspections, investigations, or assessments of workplace conditions

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- 1) This exemption does not apply when fall protection systems or equipment meeting the requirements have been installed and are available.
- b. Ladders (fire service or otherwise): Portable ladders and hose towers with enclosed ladder wells
- c. Other elevated locations
- d. For a list of other exceptions available, see [CCR Title 8, Section 3210](#)

F. [Qualified Persons](#)

1. The Health Safety Officer (HSO) is SDFD's designated trained Qualified Person (QP)
 - a. All Fire Battalion Chiefs and Lifeguard Lieutenants will be certified
 - b. Additional personnel will be trained as needed
2. QP is responsible for identifying/recognizing fall hazards and selecting the appropriate type and amount of fall protection.
 - a. QP shall have a working knowledge and understanding of fall protection requirements, guard rail systems, safety net systems, [personal fall protection systems](#), and alternative fall protection plans.
 - b. Where personal fall protection systems are used, the QP ensures employee training on the personal fall protection selected.
3. The HSO shall review the fall protection program annually when there has been a fall-related accident or near miss, when new technology has been introduced, and when circumstances warrant it.
 - a. BCs and LTs will review/update any facility fall hazards yearly during station inspections.

G. [Competent Person](#)

1. The Competent Person (CP) :
 - a. Ensures that the fall protection program is implemented.
 - a. Utilizes a preexisting universal job hazard analysis (JHA) for regular occurring conditions (or).
 - b. Performs the JHA to look for fall hazards via a [JHA form link](#). Determines the need and most appropriate type of fall protection system or develops the proper fall protection plan with the QP approval.
 - c. See appendix 2
 - b. Has the authority to take prompt and corrective measures, including stopping work.
 - c. Is responsible for ensuring that guard rails, safety net systems, personal fall protection systems and fall protection plans are in place, that they are properly inspected and used.
 - d. Is properly trained

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- e. Is responsible for documenting and disseminating the fall protection plan including scope of work, duration, known hazards, potential hazards, and mitigation attempts.

H. Job Hazard Analysis (JHA)

1. The process of looking for workplace hazards
2. The person conducting the JHA is looking for fall hazards
3. Performed by either the QP or CP
4. Conducted annually as part of the required annual safety inspection of facilities and includes training sites
5. Conducted when employees are operating in the field under non-emergency conditions
6. Performed when activities, tasks, or changes may introduce new fall hazards
7. Steps of a JHA
 - a. Break the job into logical steps
 - b. Identify each hazard in each of the steps
 - c. Develop measures to reduce or eliminate risk for each of the hazards identified
 - d. Review and update periodically

I. Potential Fall Hazards

The following examples describe some common, but not all, fall hazards.

1. Unprotected sides and edges
 - a. Employees on a walking-working surface, top of apparatus, roofs, or any area with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level is protected from falling by:
 - 1) Guardrail systems
 - 2) Safety net systems
 - 3) Covers
 - 4) Personal fall protection systems
 - 5) Personal Protective Equipment (must be used in conjunction with the items above)
 - 6) Fall protection plan (when the above cannot be accomplished)
2. Other Elevated Locations
 - a. The unprotected sides of elevated work locations that are not buildings or building structures where an employee is exposed to a fall of 4 feet or more shall be provided with guardrails.
 - b. If overhead clearance prohibits installation of a 42-inch guardrail, a lower rail or rails shall be installed.
 - 1) Railings will have a toe board when:
 - a) Work location is 6 feet or more above places where employees normally work or pass

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- b) The lack of a toe board could create a hazard from falling tools, material, or equipment
- 3. Dangerous Equipment
 - a. Each employee operating less than 4 feet (1.2 m) above dangerous equipment is protected from falling into or onto the dangerous equipment by a guardrail system or a personal fall protection.
- 4. Hoist Areas
 - a. Employees working in a hoist area are protected from falling 4 feet (1.2 m) or more to a lower level.
 - b. When any portion of a guardrail system, gate or chains are removed and an employee must lean through or over the leading edge of the access [opening](#) to facilitate hoisting, the employee shall be protected from falling by a [personal fall arrest system](#).
 - c. Grab handles installed at hoist areas must meet OSHA requirements.
- 5. [Holes](#) (Horizontal)
 - a. Employees are to be protected from falling through any hole that is 4 feet (1.2 m) or more above a lower level.
 - b. Covers meeting OSHA criteria may be used to provide fall protection from falling through floor holes.
- 6. Parapet Roof
 - a. A parapet roof of less than three feet requires a fall protection plan.
- 7. Stairway Hole
 - a. Employees are to be protected from falling into a stairway floor hole by a fixed guardrail system on all exposed sides, except at the stairway entrance. Exceptions may apply.
- 8. Ladderway Floor Hole
 - a. Employees are to be protected from falling into a ladderway floor hole or ladderway platform hole by a guardrail system and toe boards erected on all exposed sides, except at the entrance to the hole, where a self-closing gate or an offset must be used.
- 9. Hinged Floor/Skylights/Hatchway/Chute Floor Hole
 - a. Hole cover that meets OSHA criteria and a fixed guardrail system that leaves only one exposed side.
 - b. When the hole is not in use, ensure the cover is closed or a removable guardrail system is provided on the exposed sides.
 - c. A removable guardrail system on not more than two sides of the hole and a fixed guardrail system on all other exposed sides.

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- d. The removable guardrail system is kept in place when the hole is not in use or, a guardrail system or a travel restraint system when a work operation necessitates passing material through a hatchway or chute floor hole.
- 10. Openings (Vertical)
 - a. Employees on a walking-working surface near an opening, including one with a chute attached, where the inside bottom edge of the opening is less than 39 inches (99 cm) above that walking-working surface and the outside bottom edge of the opening is 4 feet (1.2 m) or more above a lower level are protected from falling.
- 11. Fixed Ladders
 - a. Employees climbing fixed ladders that extend more than 24 feet (7.3 m) above a lower level are protected from falling.
 - 1) Fixed ladders installed before November 19, 2018 shall be equipped with a personal fall arrest system, ladder safety system, cage or well.
 - 2) Fixed ladders installed on and after November 19, 2018, shall be equipped with a personal fall arrest system or a ladder safety system.
 - b. When a one-section fixed ladder is equipped with a personal fall protection or a ladder safety system:
 - 1) The personal fall arrest system or ladder safety system provides protection throughout the entire vertical distance of the ladder, including all ladder sections.
 - 2) The ladder has rest platforms provided at maximum intervals of 150 feet (45.7 m).
 - c. When a fixed ladder is equipped with a personal fall arrest or ladder safety system on more than one section:
 - 1) The personal fall arrest system or ladder safety system provides protection throughout the entire vertical distance of the ladder, including all ladder sections.
 - 2) The ladder has rest platforms provided at maximum intervals of 150 feet (45.7 m).
- 12. Stairways
 - a. Employees exposed to an unprotected side or edge of a stairway landing that is 4 feet (1.2 m) or more above a lower level are protected from falling by a guardrail or stair rail system.
- 13. Low-Slope Roofs

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- a. When work is performed at least 6 feet (1.6 m) but less than 15 feet (4.6 m) from the roof edge, each employee is protected from falling by using a guardrail system, safety net system, travel restraint system or personal fall arrest system.
 - b. This shall include training props.
14. Fire and Lifeguard Apparatus
 - a. The top of the apparatus becomes a walking/working surface when employees are standing on it.
 - 1) The employee shall decide whether they are performing a visual inspection or performing *intended work* such as loading hose, retrieving equipment, or cleaning.
 - 2) If intended work, then employee must follow the fall protection plan.
 - b. CP will perform a JHA with the crew member working on top of the apparatus and will:
 - 1) Provide steps to mitigate hazards and ensure proper PPE is worn.
 - 2) Monitor the crew member on top of the apparatus and continuously ensure no hazards emerge.
 - c. Other approved methods of fall prevention may be used as long as they don't cause additional hazards to the individual performing work.
 - d. Fire and Lifeguard apparatus hazard mitigation efforts:
 - 1) Avoid apparatus surface when its wet (except for essential tasks)
 - 2) Remove or move any potential tripping hazards
 - 3) Ensure apparatus is parked on a level surface
 - 4) Minimum PPE of a helmet shall be worn
 - 5) Open (butterfly) hose bed cabinets to the vertical position to provide a temporary fall protection railing
 - 6) Utilize fall protection plan (when the above cannot be accomplished)
 - e. Appendix 1
 - a. Job Hazard Analysis and Hazard Correction Universal Form for Top of Apparatus
15. Fall Hazards not otherwise addressed:
For walking-working surfaces not otherwise addressed, each employee will be protected from falling from a walking working surface 4 feet (1.2 m) or more above a lower level. This is accomplished by:
 - a. Guardrail systems
 - b. Safety net systems

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- c. Covers
- d. Personal fall protection system
- e. Fall protection plan (when the above cannot be accomplished)

J. Fall Protection Plan

This section applies to all operations when it can be shown that the use of conventional fall protection is impractical or creates a greater hazard.

1. The fall protection plan:
 - a. Is prepared by a CP or QP
 - a. Consultation with the department QP if additional expertise is required, and developed specifically for the work/training site or universal condition
 - b. Is maintained and up to date
 - c. Includes identity of the CP and QP that approved the plan
2. Copy of the fall protection plan with all approved changes shall be maintained in Smartsheet.
3. The implementation of the fall protection plan shall be under the supervision of a CP.
4. The fall protection plan will:
 - a. Document the reasons why the use of conventional fall protection systems (guardrails, personal fall arrest systems or safety nets) are **NOT** feasible or why their use would create a greater hazard.
 - b. Include a written discussion of other measures taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection provided by conventional fall protection systems.
 - 1) For example, the CP shall discuss the extent to which scaffolds, ladders or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling.
 - c. Identify each location where conventional fall protection methods cannot be used.
 - 1) Where no other alternative measure (i.e. scaffolds, ladders, vehicle mounted work platforms, etc.) has been implemented, a designated spotter will be used in conformance with Section 1671.2(b).
 - d. Include name or job title of those designated to work in controlled access zones. No other employees may enter controlled access zones.
5. Before employees are exposed to fall hazards:
 - a. QP shall select all fall protection systems.
 - b. All fall protection systems comply OSHA design and performance criteria.
 - c. Employees are properly trained on the inspection, use, limitations, and maintenance of:

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- 1) The personal fall protection system they will be using
- 2) The [engineered systems](#) that they will be using
- d. Annual employee training, when new technology is introduced, or when an employee demonstrates a lack of requisite knowledge or application.
6. Training
 - a. Employees must attend a training provided by the department and approved by the HSO/QP.
 - b. Training shall include hazard identification (JHA), risk elimination or reduction measures, and steps to develop a fall protection plan.
 - c. Employees must be trained in the following areas:
 - 1) The nature of fall hazards in work areas
 - 2) The correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems
 - 3) The use and operation of controlled access zones and guardrail, personal fall arrest, safety net, warning line and safety monitoring systems
 - 4) The role of each employee in the safety monitoring system when the systems are in use
 - 5) The correct procedures for equipment and materials handling and storage during roof operations
 - 6) Employee role in the fall protection plans
 - d. Training facilities that have guard rails or other fall protection devices must be used.
7. Emergency Response
 - a. Recognition of a fall hazard risk and the communication of a mitigation plan is essential during emergency responses.
 - b. The following examples describe common (but not all) fall hazards encountered during emergency responses.
 - 1) Unprotected sides and edges (subsurface or elevated)
 - 2) A walking-working surface, traversing over, or any area with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level, including, but not limited to:
 - a) Cliff or bluff edge
 - b) Confined Space opening
 - c) Trenches
 - d) Trees
 - e) Tower
 - f) Or other locations that are not a building or structure

K. Fall Protection Compliance

1. Where feasible, ensure employees are protected from falling by:

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- a. Guardrail systems
- b. Safety net systems
- c. Covers
- d. Personal fall protection systems
- e. Fall protection plan (when the above cannot be accomplished)
 - 1) Plan can utilize existing Fall Protection Plans or developed on-site through the use and operation of:
 - a) Controlled access zones
 - b) Warning line
 - c) Life safety communication broadcast to all on-scene personnel
 - d) Safety monitoring systems
 - e) Designated CP as a spotter without any other duties
 2. The mitigation of a known or potential fall hazard shall be documented on a site safety plan.

L. FIELD LEVEL JOB HAZARD ANALYSIS

1. Date:
2. Location(s):
3. Facility Name
4. Station #
5. Describe Location
6. Intended work
7. Potential Fall Hazards
8. Control Measures
9. If applicable: Describe why conventional fall protection systems (guardrails, personal fall arrest systems or safety nets) are NOT feasible.
10. Plan to eliminate or mitigate the hazard
11. Supervisor completing the JHA
12. BC/LT that Reviewed the JHA
13. BC/LT name
14. Narrative (if applicable)

V. DEFINITIONS

Competent Person: A person (first-level supervisor or higher, however, can be delegated) who can identify existing and predictable hazards in the surroundings or in working conditions that are unsanitary, hazardous, or dangerous and who has the authorization to take prompt corrective measures to eliminate them. [RETURN](#)

Engineered Systems: Refers to guardrail systems, safety net systems, and covers. [RETURN](#)

Fall Hazard: Any condition on a walking-working surface that exposes an employee to a risk of harm from a fall on the same or lower level. [RETURN](#)

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Fall Protection: Any equipment, device, or system that prevents a fall from an elevation or mitigates the effect of such a fall. [RETURN](#)

Fall Protection Plan: Implemented when it is [infeasible](#) or creates a greater hazard to use guardrails, safety nets, or personal fall protection systems, meets CalOSHA requirements. [RETURN](#)

Fall Protection System: Engineered and personal fall protection systems, including guardrail systems, safety nets, covers, personal fall protection, and fall protection plans. [RETURN](#)

Guardrail System: A barrier erected along an unprotected or exposed side, edge or other area of a walking-working surface to prevent employees from falling to a lower level. [RETURN](#)

Hole: A gap or open space in a floor, roof, horizontal walking-working surface, or similar surface that is at least 2 inches (5 cm) in its least dimension. [RETURN](#)

Infeasible: It is impossible to perform the work required using a conventional fall protection system (i.e., guardrail system, safety net system or personal fall arrest system) or that it is technologically impossible to use any of these systems to provide fall protection. [RETURN](#)

Opening: A gap or open space in a wall, partition, vertical walking-working surface or similar surface that is at least 30 inches (76 cm) high and at least 18 inches (46 cm) wide, through which an employee can fall to a lower level. [RETURN](#)

Personal Fall Arrest System: A system used to arrest a fall from a walking-working surface. It consists of a body harness, anchorage, and connector. The means of connection may include a lanyard, deceleration device, lifeline, or a suitable combination of these. [RETURN](#)

Personal Fall Protection System: A system providing protection from falling or safely arresting a fall if one occurs. Examples of personal fall protection systems include personal fall arrest systems, positioning systems, and travel restraint systems. [RETURN](#)

Qualified Person: Describes a person who, by possession of a recognized degree, certificate, or professional standing, or who, by extensive knowledge, training, and experience, has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work or the project. [RETURN](#)

Walking-Working Surface: Any horizontal or vertical surface on or through which an employee walks, works, or gains access to a work area or workplace location. [RETURN](#)

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Appendix 1:



Here's a quick update on "Fall Protection (JHA)".

Fall Protection (JHA)

Row 1

Date Created	05/19/23
Location:	All with the same conditions, In-station, Outside location, Training Prop
Facility Name	N/A
Station #	
Describe Location	Apparatus Top
Intended work	Cleaning, Inspecting, Loading hose, Retrieving equipment, Training
Potential Fall Hazards	Fire and Lifeguard Apparatus, Other Elevated Locations >4 ft, Unprotected sides and edges, Wet Surface
Control Measures	Fall protection plan
Plan to eliminate or mitigate hazard	Avoid surface when its wet (except for essential tasks), "If possible, ensure it is a level surface", Remove or move any potential tripping hazards, Supervisor (Competent) Person shall monitor or delegate the employee continues to ensure no hazards emerge
Supervisor completing JHA	David Picone
BC/LT Reviewed	Yes
BC/LT Name	Self
Narative	

[View in Smartsheet](#)

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Appendix 2:

