

## SOP 09.41

## Prevention of Falls from Heights SOP

The new 09.41 Prevention of Falls from Heights SOP replaces the existing 09.41 Safe Work at Heights (SWH) SOP (endorsed 2021)

- SOP renamed and scope broadened to include other types of equipment used to work at heights.
- Clearly state the emergency services exemption from the OHS Regulations.
- Clarified the use of chainsaws in combination with the SWH system of work.
- Clarified the use of ladders, including during training.
- **Apart from Safety Notes there is an extra section on Safety Considerations when working from roofs or external structures.**
- SOP is far more detailed than the OLD SOP

NOTE – We have done our best to match the new SOP clauses with the old SOP however in some cases they do not match and the comparison is left blank.

### Colour code

	Minor change in wording
	Small updates in the wording but the intent is the same as the old SOP
	Significant change or new procedure in the new SOP

	NEW SOP 09.41 Prevention of falls from heights	OLD SOP 09.41 Safe Work at Heights (SWH)
Objective	(1) To ensure the safety of CFA members undertaking work at heights.	To ensure the safety of CFA members undertaking work at heights, including compliance with the Victorian <i>Occupational Health and Safety Act 2004</i> and associated Regulations related to working at heights.
Scope	(2) This procedure applies to all CFA members involved in operational and training activities.	This Standard Operating Procedure applies to all CFA members involved in operational and training activities.
Section 3 – Procedure  Prevention of Falls in Emergency Response	(3) CFA Safe Work at Heights (SWH) systems and equipment are not to be used in emergency response situations, including rescue and firefighting operations. Alternatively, ladders can be used in emergency incidents in accordance with clauses 4 – 10. a. SWH equipment should only be used for operational activities where there is no other option but to perform work where a fall hazard exists, and there is no safer alternative work practice, for example, chimney fires.	<ol style="list-style-type: none"> <li>1. Only qualified CFA members who have maintained their Safe Work at Heights (SWH) competency, shall undertake the task of using SWH equipment</li> <li>2. CFA SWH system is intended for undertaking work on a residential style structure roof up to 2 storeys.</li> <li>3. SWH operators shall not use SWH equipment to undertake rescue operations of other persons (other than within the SWH scope of 'self rescue' capability).</li> </ol>

		<ol style="list-style-type: none"><li>4. SWH operators shall not use SWH equipment to undertake work at heights during hot fire operations.</li><li>5. The incident controller (IC) shall consider the following when determining the requirement to deploy SWH system:<ul style="list-style-type: none"><li>• Is there a fall hazard that cannot be eliminated by other means?</li><li>• Is there a requirement to work at height where other strategies and tactics cannot be used?</li><li>• Can the work be performed from ground level?</li><li>• Can the work be performed from an aerial appliance if available?</li></ul></li><li>6. SWH systems shall only be used for operational activities where there is no other option but to perform work where a fall hazard exists, and there is no safer alternative work practice</li><li>7. A dedicated Safety Officer shall be in place when using SWH systems during all practice training and operations. The Safety Officer must be SWH operator with the relevant skills and experience in the systems.</li><li>8. All personnel must be briefed on their role, the tasks being undertaken, the identified hazards and control measures to eliminate or reduce the risks identified, prior to activities commencing. For training activities these hazards and hazard control measures should be documented at the earliest opportunity.</li><li>9. SWH kit contents and equipment shall not be altered and remain as supplied by State PPE/C Management Centre</li></ol>
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	<p>(4) CFA members have a special provision under the Occupational Health and Safety Regulations 2017 to use ladders at heights over 2 metres for emergency response situations, including training for those situations (e.g. firefighting or search and rescue). CFA members involved in ladder operations will consider:</p> <ul style="list-style-type: none"> <li>a. If working at heights (e.g. working from a roof) is necessary, and if response could be conducted from the ground.</li> <li>b. If a ladder platform would be appropriate (taking into account travel time and urgency of the situation).</li> </ul>	
<p>Ladder Safety Requirements</p>	<p>(5) Ladders can be used both in training and in emergency response situations. Operations should comply with the relevant occupational health and safety legislation.</p>	
	<p>(6) The Incident Controller (or instructor) will determine when to deploy ladders higher than 2 metres.</p> <ul style="list-style-type: none"> <li>a. CFA members should seek the approval of the Incident Controller or next in charge before using ladders in emergency response.</li> </ul>	
	<p>(7) The Incident Controller (or instructor) should appoint a dedicated Safety Officer when operating at heights above 2 metres (e.g. on a roof).</p>	
	<p>(8) Before and during ladder operations, a Dynamic Risk Assessment (DRA) should be conducted by all CFA members to ensure any possible fall hazards have been reduced as much as operationally practicable. To prioritise firefighter safety when conducting ladder activities, CFA members should also uphold a safe person approach during response.</p>	
	<p>(9) When using ladders, CFA members should utilise the appropriate equipment for securing ladders to roofs, gutters, and access points.</p>	
	<p>(10) Refer to Fireground Practices- Section 6: Ladders for the safe handling and transportation of ladders.</p>	

	Note: for guidance on the prevention of falls from CFA vehicles, please refer to SOP 12.01 Driving or Travelling in CFA and ESO Vehicles.	
Storm and Flood Recovery Operations	(11) Only qualified CFA members who have maintained their Safe Work at Heights (SWH) competency should undertake the task of using CFA SWH systems and equipment to participate in storm and flood recovery.	
	(12) The SWH system is intended for completing work on a residential-style structure roof up to two storeys, this mainly includes operations following a storm or flood event. <ul style="list-style-type: none"> <li>a. CFA members endorsed in SWH operations can use SWH equipment for cross-cutting or felling debris caused by storm and flood events. In these situations, CFA members should also have the appropriate chainsaw qualifications.</li> <li>b. SWH operators should not use SWH equipment to undertake rescue operations of other persons (other than within the SWH scope of 'self rescue' capability).</li> <li>c. SWH operators should not use SWH equipment to undertake work at height during hot firefighting operations.</li> </ul>	
SWH Systems Requirements	(13) The Incident Controller/CFA Agency Commander should consider the following when determining the requirement to deploy a SWH system: <ul style="list-style-type: none"> <li>a. Is there a fall hazard that cannot be eliminated by other means?</li> <li>b. Is there a requirement to work at a height where other strategies and tactics cannot be used?</li> <li>c. Can the work be performed from ground level?</li> <li>d. Can the work be performed from an aerial appliance if available?</li> </ul>	
	(14) Prior to commencing activities with SWH equipment, CFA members should maintain a safe person approach and conduct a Dynamic Risk Assessment to determine and assess any potential fall hazards.	

	(15) A minimum of three SWH operators are required to set up and utilise the SWH system.	
	(16) A maximum of two rooftop operators should be connected to the system at a time.	
	(17) SWH operators must be able to walk on the roof pitch and not use the rope as a support system.	
	(18) While using SWH equipment, no rappelling or other work outside the scope of the system is to be undertaken.	
	(19) Before the activities commence, all CFA members involved must be briefed on: <ul style="list-style-type: none"> <li>a. Their role.</li> <li>b. The tasks being undertaken.</li> <li>c. Communications plan for contact between all SWH operators and firefighters (e.g. use of radios).</li> <li>d. The identified hazards and control measures to eliminate or reduce the risks identified.</li> </ul>	
	(20) SWH kit contents and equipment should not be altered and remain as supplied by State PPE&C Management Centre.	
Training Requirements	(21) Members can practice ladder handling, footing, anchoring, and climbing techniques during training.	
	(22) When using ladders for training activities, CFA members should not climb above 2 metres unless the following safety measures are in place: <ul style="list-style-type: none"> <li>a. The ladder is appropriately footed and secured.</li> <li>b. A Dynamic Risk Assessment has been undertaken prior to commencing training activities involving ladders.</li> <li>c. A Safety Officer has been appointed.</li> </ul>	

	(23) Depending on the height or when dismounting the ladder above 2 metres, additional safety considerations may need to be applied.	
	(24) A dedicated Safety Officer should be in place when using SWH equipment during all practical training. The Safety Officer must be a SWH operator with the relevant skills and experience in the systems.	
Safety Note	(25) When operating at a height of 2 metres or less, CFA members should take the necessary measures to reduce the risk of a fall injury so far as is reasonably practicable.	.Before any task is undertaken, A Dynamic Risk Assessment (DRA) is to be conducted in line with JSOP 8.02 Dynamic Risk Assessment and communicated and understood by all crew members.
	(26) Appropriate Personal Protective Clothing (PPC) is to be worn at all times with consideration for mobility and the potential for Protective Equipment (PE) to alter a person’s centre of balance. Consideration must be given to the requirement for respiratory protection only where that level is required.	Appropriate PPC to be worn at all times with consideration for mobility and altering a persons centre of balance with PE etc, Consideration must be given to the requirements for respiratory protection only where that level is required
	(27) When working at height, any safety incidents, hazards or near misses must be reported in CFASafe as soon as reasonably practicable.	Risk Control measures should be documented in the incident log as soon as possible
Safety Considerations when Working From Roofs or External Structures	(28) The hierarchy of control for working at heights is: <ol style="list-style-type: none"> <li>a. Eliminate the risk and work from the ground.</li> <li>b. Use guard rails, passive fall protection or elevating work platforms.</li> <li>c. Utilise a work positioning system.</li> <li>d. Use a Safe Work at Heights system or or fall arrest system (depending on the operation).</li> <li>e. Use ladder equipment.</li> </ol>	<p>Training activities should have a documented Risk assessment prior to commencing the activity.</p> <p>If there is a risk that a fall may occur, measures must be put in place to eliminate or control the risk. The primary goal si to eliminate the risk, or reduce the risk as far as is practicable.</p>
	(29) The following factors should be considered when undertaking works at height on roofs: <ol style="list-style-type: none"> <li>a. How many people are required for the task?</li> <li>b. What is the safest route onto the roof?</li> <li>c. What is the roof’s material and is it safe to walk on?</li> </ol>	<p>The preferred hierarchy of control for working at heights is:</p> <ul style="list-style-type: none"> <li>• Work from ground</li> <li>• Assess the need to undertake the work at height</li> <li>• Use fire agency aerial appliance (if available)</li> <li>• Use SWH systems</li> </ul>

	<p>d. Consider the roof pitch, surface and condition and if it has been impacted by rain, storm or fire.</p> <p>e. Consider the weather conditions.</p> <p>f. Assess the ground conditions and stability.</p> <p>g. Are there any secondary hazards, such as powerlines, solar panels, skylights etc?</p> <p>h. Are there any projectiles that could fall from the roof?</p>	Systems outside the scope of the SWH training will require specialist skills
Section 4-Definitions	<b>(31) Commonly defined terms are located in the CFA centralised glossary.</b>	
	<b>(32) Height: Any height over 2 metres vertically from the ground.</b>	
	<b>(33) Safe Work at Heights (SWH) Systems: CFA introduced the Safe Work at Heights system for Brigades responding to common operational incidents involving residential homes and small commercial buildings. This was put in place to reduce the risks associated with working at heights by supporting Brigades with training and the appropriate equipment.</b>	
	<b>(34) Safe person approach: The safe person approach prioritises firefighter safety over all other suppression considerations and activities and must be continually practiced at all times.</b>	
Section 5 – Related Documents	<p><b>(35) FGP 6.1.1 Carrying a double extension ladder</b></p> <p><b>(36) FGP 6.1.2 Using a double extension ladder</b></p> <p><b>(37) FGP 6.2.1 Carrying a reverse fly ladder</b></p> <p><b>(38) FGP 6.2.2 Using a reverse fly ladder</b></p>	