Fall Protection Program

Paramount Media Networks
2025 Update

Paramount Media Networks
Fall Protection Program

Table of Contents

1. Overview, Purpose and Scope

1.1. Purpose

This Fall Protection Program (the Program) has been prepared to enhance the safety and health of Paramount Media Networks (PMN) employees. The Program provides information to reduce the risk of falls and injury from work, including work from heights. The Program has been written to comply with federal Occupational Safety and Health Administration ("OSHA") and California Cal/OSHA requirements pertaining to fall protection. More specific requirements may apply in state-plan states other than California.[*/] This Program is meant to be used in conjunction with other production safety program documents and information, such as the Injury and Illness Prevention Program (in California) and the Production Safety Program manual.

1.2. Scope and Overview

This Fall Protection Program shall apply to all employees exposed to unprotected sides or edges of surfaces that present **a falling hazard of four feet or more to a lower level (six feet or more for construction work).**

Exceptions to this requirement **may** include:

- exposed perimeters of entertainment stages
- portable ladders, when working within the envelope of the ladder
- fixed ladders up to 20 feet
- scaffolds up to 10 feet in height (for construction work)
- working sides of active loading docks
- edge of an excavation, shaft, or pit up to 6 feet in depth (for construction work)

Falls are one of the most common causes of serious injuries in the workplace. Falls can occur from overhead platforms and work areas or into holes in the floor and walls. Notably, OSHA has different requirements for construction work, such as building scenery or demolition work while striking sets, than for other production work. OSHA requires fall protection for construction work occurring at elevations of six feet but requires that work be protected at elevations of four feet for all other work. If you are unsure which elevation applies to your work, consult with the PMN Production Safety, your Safety Program Director, or your assigned safety consultant. You may also assume that the more stringent four-foot elevation limit applies.

[*/] In addition to California, several other states have federally approved occupational safety and health plans: Alaska, Arizona, Hawaii, Indiana, Iowa, Kentucky, Maryland, Michigan, Minnesota, Nevada, New Mexico, North Carolina, Oregon, South Carolina, Tennessee, Utah, Vermont, Virginia, Washington, and Wyoming.

2. References

Number	Title
Title 29, Code of Federal Regulations, 1910 CFR Subpart D; Subpart I	General Industry – Walking – Working Surfaces; Personal Protective Equipment
Title 29, Code of Federal Regulations, 1926 CFR Subpart M; Subpart X	Construction Industry – Fall Protection; Ladders and Stairways
Title 8, California Code of Regulations, § 1670	Personal Fall Arrest Systems, Personal Fall Restraining Systems, Positioning Devices
Title 8, California Code of Regulations, § 1671.1	Fall Protection Plan
Title 8, California Code of Regulations, §§ 3209-3212	Guardrails, Elevated Locations, Floor Openings, Floor Holes and Roofs
OSHA Website	http://www.osha.gov/SLTC/fallprotection
Cal/OSHA Website	www.dir.ca.gov/dosh/etools/08-010/TE_FallProtection.htm

3. Definitions

Further definitions can be found in federal, California and other states' regulations.

Term	Definition
Aerial Lift	Vehicle-mounted device used to elevate personnel, such as powered platforms, articulating or extendable boom platforms, rotating work platforms, aerial ladders, and vertical towers.
Anchor Point	A secure point of attachment for lifelines, lanyards or deceleration devices.
Authorized (or Qualified) Person	A person designated by the employer who by reason of training, experience, or instruction has demonstrated the ability to perform safely all fall protection duties.
Body Belt	A strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration (grabbing) device. Use of body belts for fall protection are prohibited by Cal/OSHA.
Body harness (also referred to as Full-body harness)	An interconnected set of straps that may be secured about a person in a manner that distributes the fall arrest forces over at least the thighs, pelvis, waist, chest, and shoulders with a means for attaching the harness to other components of a personal fall arrest system.
Competent Person	A person who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees. The competent person has the authority to impose prompt corrective measures to eliminate these hazards.
Deceleration Device	Any mechanism, such as a rope, that dissipates a substantial amount of energy during a fall arrest, or otherwise limits the energy on a worker during fall arrest.

Term	Definition
Elevated Work Surfaces	Work platforms more than six feet above a lower level for construction; four feet for all other work.
Fall Arrest System	System used to arrest a person in a fall from a working level. It consists of an anchorage, connectors, and a body harness and may include a lanyard, deceleration device, or lifeline.
Fixed Ladder	A ladder permanently attached to a structure, building, or equipment.
Guard Rail	A barrier erected to prevent personnel from falling to lower levels.
Hole	A void or gap 2 inches or more in a floor, roof, or other walking/working surface.
Horizontal Lifeline	Linear anchoring devices that allow workers to move along the whole length of the anchor, usually without needing to disconnect and fixing points of the anchorage. Horizontal lifelines must be designed by a Qualified Person.
Lanyard	A flexible line of rope or strap that generally has a connector at each end for connecting the body harness to a deceleration device, lifeline or anchor point.
Opening	A gap or void 30 inches or more high and 18 inches or more wide in a wall or partition, through which personnel can fall to a lower level.
Portable Ladder	See Construction: 29 CFR 1926.1053. All other work: 29 CFR 1910.23-27
Positioning Device	A body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.
Qualified (or Authorized) Person	A person designated by the employer who by reason of training, experience, or instruction has demonstrated the ability to perform safely all fall protection duties.
Restraint Line	A device which is attached between the worker and an anchorage to prevent the worker from walking or falling off an elevated surface.
Scaffold	Any temporary elevated or suspended platform, and its supporting structures, used for supporting workers or materials or both. See Construction: 29 CFR 1926.451-454; All other work: 29 CFR 1910.28 (scaffolds); 1910.67 (aerial lifts); 1910.68 (manlifts)
Self-retracting lifeline/lanyard (also called a yoyo)	A deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under minimal tension during normal movement and which, after onset of a fall, automatically locks the drum and arrests the fall (usually within two feet or less).
Toe Board	A low protective barrier that prevents material and equipment from falling to lower levels and which protects personnel from falling.
Tie Off	A procedure of connecting directly or indirectly to an anchorage point.
Unprotected Sides and Edges	Any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system. Federal OSHA does not allow work closer than 15 feet to an unprotected edge. Cal/OSHA allows work no closer than 7.5 feet to an unprotected edge.

4. Responsibilities

All employees share a responsibility to reduce the hazards associated with falls.

Role	Responsibility
PMN Production Safety Department	• Provide technical information and assist production in implementing an effective fall protection program. • Provide technical information and assist production in designing controls for fall protection. • Provide and/or coordinate fall protection training as needed. • Provide advice to productions on acquisition of fall protection equipment. • Provide assistance in the investigation and documentation of all reported accidents that are related to fall hazards, including recommending corrective actions, as appropriate. • Review and revise the Fall Protection Program, as needed for compliance with applicable regulations.
Safety Program Director, Safety Coordinators	• Evaluate production activities to determine if and which activities are covered by the Fall Protection Program • Designate individuals who will act as Competent and/or Qualified Persons responsible for the implementation of the Fall Protection Program • When PMN employees engage in activities covered by the Fall Protection Program: – Ensure that Competent and/or Qualified Persons are adequately trained and/or qualified. – Provide administrative and financial support for this program within individual productions. – Ensure the Fall Protection Program is implemented and maintained throughout the production. – Complete an Incident Investigation Report and any additional documentation needed to investigate work-related injuries and illnesses related to fall hazards.
Department Safety Coordinators	• Ensure that employees in their departments are informed, trained, and provided with the appropriate fall protection systems and equipment to be protected from potential fall hazards associated with job tasks. • Coordinate the correction of fall hazards brought to their attention by employees.
Competent Persons	• Implement all aspects of the program for work areas under their control. • Receive training for Competent Person and maintain status. • Act as the Competent Person for job sites under their control that contain fall hazards. • Evaluate fall hazards in work areas under their control. • Ensure that employees are informed, trained, and provided with the appropriate fall protection systems and equipment to be protected from potential fall hazards

Role	Responsibility
Qualified/Authorized Employees	• Comply with the Fall Protection Program and any further safety recommendations provided by PMN Production Safety Department, Safety Program Director and designees regarding fall protection. • Complete fall protection training requirements and request further instruction if unclear. • Conduct assigned tasks in a safe manner and properly wear fall arrest or wear all assigned personal protective equipment. • Report to Safety Program Director or designee any frequently accessed work platforms, including roofs, that are not protected by guardrails or some other fall protection system
Contractors	• Comply with all applicable regulations. • Have and enforce their own fall protection program

5. Fall Protection Program Requirements

5.1. Identification of Fall Hazards

Fall hazards from elevations include, but are not limited to, unprotected sides and edges of roofs, excavations, skylights, floor holes, wall openings, and all other walking or working surfaces **where personnel can possibly fall four feet or more to a lower level (six feet in construction work)**. Each production shall be responsible to inspect for potential fall hazards and to have each potential fall hazard evaluated by a Competent Person.

Employees should alert their supervisors to potential fall hazards not already identified and controlled. The following are examples of fall hazards which require protection:

1. Open sided floors, catwalks, runways, work platform four feet or more in height must be guarded using a railing and toe board or a floor hole cover

2. Regardless of height, open sided floors, ramps, walkways, that are near or above dangerous operations must be guarded

3. Wall openings and windows less than 42 inches from the floor from where there is a drop of more than 4 feet require guarding or other protection.

4. Any floor openings into which a worker can accidentally walk should be guarded

5. Scaffolds over 10 feet high (for construction work)

6. Aerial lift devices

7. Skylights that are even with the roof surface, that represent fall hazards or that may otherwise serve as a walking/working surface

When fall protection hazards have been identified, consider these additional hazards:

1. Placement of toe boards

2. Need for use of hard hats

3. Storage of equipment near an unprotected edge while on elevated work surfaces

4. Protection for high traffic areas from work above. (The area to which objects could fall must be barricaded or a canopy must be built.)

5.2. Specific Program Requirements

Fall hazards must be controlled through conventional fall prevent systems (guardrails, personal fall arrest systems, or safety nets) unless these controls are infeasible and doing so would create a greater safety hazard. When engineered controls, such as guardrails and safety nets are not feasible, personal fall arrest systems and training must be instituted.

A. **Authorizations**. Work in unprotected elevated areas requires prior approval by a Competent Person.

B. **Preferred Engineered Controls for Full Prevention**. Controls such as fall protection harnesses, lanyards, and anchorage points will be the last solution considered to protect people from falling from heights. Whenever practicable, the following engineered controls will be used to provide effective fall protection as the preferred control approach:

- **Construction Activities**. For construction activities that expose employees to unprotected heights over six feet, fall hazards can be reduced by methods such as:
  - Bringing the work down to ground level
  - Elevating work platforms and aerial devices (e.g., scissor lifts) with integral engineered fall protection
  - Scaffolds
  - Ladders
  - Using fall restraint, work positioning, and fall arrest systems only if other methods are infeasible
- **Roofs**. Engineered guardrails designed in accordance with applicable regulations or 42-inch-high parapets are required at roof edges when frequent access is required (more than four times a year).
- **Other elevated work surfaces**. Engineered guardrails designed in accordance with applicable standards are required for elevated fixed platforms, mezzanines, catwalks, and balconies when frequent access is required. For infrequent access at these locations or if guardrails are infeasible, fall protection personal protective equipment may be used.

5.3. Standards for Engineered Controls

A Competent Person must determine if engineered controls can eliminate or lessen the hazard of the work area and/or eliminate the need for personal protective equipment. Engineered controls for fall hazards include the following:

A. **Guardrails and Toe Boards**

The use of guardrails and toe boards apply to temporary controls on job sites as well as permanent fixtures in fixed work areas. The following requirements apply:

- The standard railing consists of a top rail, mid rail, and posts and is 42 – 45 inches high from the top of the rail to the floor, platform, runway or ramp. Nominal height of the mid rail is 21 inches.
- Railing must be constructed of minimum 500-lb. strength material.
- The anchoring of posts and framing of members for railings of all types must be of such construction that the completed structure is capable of withstanding a load of 200 pounds applied in any direction at any point on the top rail.

- Guardrail systems have a smooth surface that prevents injuries such as punctures and lacerations and prevents snagging of clothing.

- Standard toe boards must be a minimum of 3.5 inches high, no more than 1/4-inch clearance to the floor.

- When guardrail systems are in hoisting areas, a chain gate or removable guardrail section shall be in place when not being used.

B. **Covers for Holes**

- Covers for holes, including grates, shall be capable of supporting at least twice the weight of employees, equipment, and materials that are expected to bear on the cover at any one time.

- Covers located on roadways and vehicular aisles shall be capable of supporting at least twice the maximum axle load of the largest vehicle expected to cross over it.

- All covers shall be secured when installed so as to prevent accidental displacement by equipment, work, or weather.

- While a cover is not in place, the pit or trap opening shall be constantly attended by a Competent Person or shall be protected on all exposed sides by removable standard railings.

C. **Skylights**

- Skylights that may be used as a walking or working surface must be protected by a standard railing, standard skylight screen, grill work with 4 by 4-inch openings or slat work with 2-inch openings.

- Standard skylight screens must be capable of withstanding a minimum load of 200 pounds applied perpendicular to any point on the screen and screens must not deflect under ordinary loads, impacts or otherwise break the glass.

5.4. Personal Protective Equipment (PPE)

Personal protective equipment (PPE) must be used to minimize fall hazards when engineered controls do not eliminate the hazard, or in conjunction with engineered controls.

Even when using fall protection equipment, any other PPE necessary for the task must be worn. This includes PPE such as hard hats, gloves, safety glasses, and hard-toed boots or shoes. Hard hats always must be worn when working or walking in an area beneath elevated work where objects could fall from a height and strike a worker.

Fall protection equipment can be divided into the following four categories: Restraint, Fall Arrest, Positioning and Suspension.

A. **Restraint Line**. A restraint line cannot be used for full protection except for construction work. A restraint line is a device which is attached between the employee and an anchor point to prevent the employee from walking or falling off an elevated surface. It does not support an

employee at an elevated surface, but rather, prevents the employee from leaving the elevated surface or work position. Restraint lines may be preferred to the use of fall arrest systems (part 5.4 B, below) due to their ability to prevent free fall and to reduce the need for a rescue team. Restraint lines must be able to sustain a tensile strength of at least 3,000 lbs.

B. **Fall Arrest System**. If engineered controls are not feasible, a personal fall arrest system should be used as PPE for fall hazards. A personal fall arrest system consists of: (1) a full-body harness; (2) connecting device(s) (lanyards and lifelines); (3) anchor point; and (4) in some circumstances, a deceleration/grabbing device. Employees shall use only commercially manufactured equipment specifically designed for fall protection and certified by a nationally recognized testing laboratory. All fall protection equipment must bear the marking of the manufacturer and approvals for specified use.

Requirements for the components of a personal fall arrest system include:

1. **General**

- Systems shall limit the maximum arresting forces to 1,800 pounds with a full body harness.
- The maximum free fall distance is six feet for all systems.
- The maximum deceleration distance is 3.5 feet.
- Personal fall arrest systems shall have sufficient strength to withstand twice the potential impact energy of the falling employee.
- Note the ABCs of fall arrest systems: Anchor point; Body harness; Connection device.

2. **Anchor Point**

- A fall arrest system does not provide safety if it is not tied off to a secure anchor point.
- Personal fall arrest systems shall not be attached to guardrail systems or hoists.
- Anchorages used for personal fall arrest systems must be independent of any anchorage being used to support or suspend platforms and be capable of supporting at least 5,000 pounds per employee attached, OR shall be designed, installed (temporarily or permanently), and used as part of a complete fall arrest system which maintains a safety factor of two and under the supervision of a Qualified Person.
- A Qualified Person shall determine the safety of all anchor points, both temporary and permanent. Permanent anchor points shall be properly marked and approved by a professional engineer licensed in the state where the work is performed.
- Permanent anchorage points used for fall arrest or used for positioning devices shall be inspected annually or before use by a Competent Person or a licensed professional engineer.

3. **Body Harness** – Only full-body harnesses shall be used. A body belt cannot be used instead of a full-body harness. When free fall is possible while wearing a body harness, the harness should include devices that will reduce the chance that an employee will go into shock due to restricted circulation if they are suspended in the harness.

4. **Connecting Device** – Connecting devices are shock-absorbing lanyards and lifelines that are connected securely to the body harness and to the anchor point. The requirements for connecting devices are:

   - Lanyards, lifelines, and other connecting assemblies shall have a minimum breaking strength of 5,000 pounds.

   - Lanyards shall not exceed 6 feet in length. Lanyards used on aerial lift devices should not exceed 4 feet in length to reduce slack.

   - Ropes and straps (webbing) used in lanyards, lifelines, and strength components of body harnesses shall be made from synthetic fibers.

   - Self-retracting lifelines and lanyards shall have a tensile strength of at least 3,000 pounds and limit free fall to 2 feet or less (5,000 pounds for ripstitch lanyards and tearing and deforming lanyards).

   - Lifelines shall be protected against cutting and abrasions.

   - Horizontal lifelines shall be designed, installed and used under the supervision of a Qualified Person, as part of a complete personal fall arrest system, which maintains a safety factor of two. On suspended scaffolds, beams or similar work platforms with horizontal lifelines which may become vertical lifelines, the devices used to connect to a horizontal lifeline shall be capable of locking in both directions on the lifeline.

   - Each employee shall be attached to a separate lifeline when vertical lifelines are used. On suspended scaffolds or similar work platforms with horizontal lifelines which may become vertical lifelines, the devices used to connect to a horizontal lifeline shall be capable of locking in both directions on the lifeline.

C. **Positioning Device**. A positioning device is not a substitute for a personal fall arrest system and is limited to use for employees on an elevated vertical surface, such as a wall, and work with both hands free while leaning. Where positioning device is used:

1. Only a full-body harness shall be worn as part of a positioning device system. Body belts cannot be used.

2. Positioning devices shall be rigged such that a free fall cannot be more than 2 feet.

3. Positioning devices shall be secured to an anchor point capable of supporting at least twice the potential impact load of an employee's fall or 3,000 lbs, whichever is greater.

4. Connecting devices used with positioning devices must be able to support at least 5,000 lbs.

D. **Suspension**. Personal suspension systems are used for activities like painting and are designed to lower and support a worker to perform tasks. The components of a suspension system are:

- Full-Body Harness
- Work line
- Anchorage
- Positioning device such as a boatswain's chair.

A boatswain's chair system is considered a single-point adjustable suspended scaffold. Since the suspension system components are not designed to arrest a free fall, a back-up fall arrest system should be used in conjunction with the personal suspension system that would activate only if the worker were to experience a free fall.

E. **Equipment Inspection and Maintenance**

1. **Impact Loading**. Any fall arrest system or component that has been used to arrest a fall must be immediately removed from service until a Competent Person has inspected the equipment and determines it to be undamaged.

2. **Inspection**. Visual equipment inspections of all fall personal protective equipment must be conducted by personnel prior to each use. If, upon inspection, a piece of equipment shows any signs of wear, it must immediately be removed from service and the supervisor or Safety Program Director notified. For permanent worksites such as studios, the Safety Program Director or designee must perform and document inspections of fall protection equipment annually for any such equipment used by assigned employees.

3. **Maintenance**. When needed, fall protection devices should be washed in warm water using a mild detergent, rinsed thoroughly in clean warm water and allowed to dry at room temperature. Store equipment in a clean area away from strong sunlight and extreme temperatures. Check the manufacturer's recommendations for cleaning, maintenance and storage information.

5.5. Rescue

When fall arrest systems are in use, a Competent Person will develop an effective rescue plan specific to the work location and job being performed. If a possible free-fall requires the use of a rescue team, then pre-job arrangements must be made for a standby, onsite rescue team. After a fall, a harness can restrict blood circulation, leading to further injury; therefore, prompt rescue is critically important to a safe fall arrest system. The fall rescue plan should consider the following elements:

1. Risk areas
2. Rescue systems
3. Timeliness

4. Simplicity
5. Safety of rescuers
6. Off-site rescue services
7. Training

5.6. Portable Ladder Safety

Use of separate fall protection equipment is not required when working within the envelope of a portable ladder. To work safely on a portable ladder, the following safety requirements must be met:

- Ladder must have a 4:1 climbing angle.
- Worker must climb facing the ladder.
- The ladder (other than stepladder) must be tied off to prevent sideward slippage.
- The ladder must have firm footing.
- Worker must be able to maintain three-point contact while climbing.
- Worker's center of gravity (*e.g.*, belt buckle) must stay inside the side rails.

5.7. Safety Nets

- Safety nets may be used when construction work is occurring more than 25 feet above ground, water or other surfaces and when it is impractical to use ladders, scaffolds, catch platforms, temporary floors, safety lines or fall arrest systems.
- The safety net must be tested before every use.
- Nets must extend 8 feet-13 feet beyond edge of work surface (depending upon vertical distance) and no more than 10 feet below the work surface.
- See OSHA: 29 CFR 1926.105 and California: Title 8 Calif. Code of Regulation § 1671, for further requirements.

5.8. California Only: Controlled Access Zones and Safety **Monitoring** Systems for Construction Work

In California, when construction work occurs on a platform that has an unguarded or unprotected leading edge, a Competent Person may design a Controlled Access Zone defined by a control line or other means that restricts access and signs warning unauthorized employees not to enter the area. Control lines must be erected no less than 6 feet nor more than 25 feet from the unprotected edge.

Each Controlled Access Zone must have at least one Competent Person specifically assigned to monitor the safety of other employees. The assigned Safety Monitor must watch employees and warn them if they get to too close to an unprotected edge. The Safety Monitor must be on the same working level and within sight of the employees being monitored. The Safety Monitor must also be close enough to communicate with employees orally and may have no other responsibilities while on monitoring duty.

6. Employee Training

All employees that are exposed to fall hazards shall be trained in the recognition and minimization of such hazards. Training shall be arranged through the Safety Program Director or designee. The employee shall be trained in the following areas:

a. Nature of fall hazards in the work area.

b. The correct procedures for erecting, maintaining, disassembling and inspecting fall protection systems.

c. The use and operation of controlled access zones and guardrails, personal fall arrest systems and warning lines.

d. The limitations on the use of mechanical equipment during the performance of roofing work on low-slope roofs.

e. The correct procedures for equipment and materials handling and storage and the erection of overhead protection.

f. The employee's role in fall protection plans.

Qualified Employees and Competent Persons must have the training listed above, at a minimum, as well as additional training, experience, and authority for that position.

7. Contractors

Outside contractors must work safely at PMN worksites and protect all workers and visitors from risks of falls. Contractors are required to comply with all applicable regulations and must have and enforce their own fall protection program, as appropriate