

Accessibility Plan

11 May 2023

Revision 1 – 04 December 2023

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KEEWATIN AIR LP

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Part 1: General

1.1 Background

Keewatin Air LP (KAL) is committed to complying with the Accessible Canada Act, the Accessibility for Manitoban's Act, and the requirements for accessibility as required by the Canadian Transportation Agency (CTA).

1.2 Executive Summary

KAL's Accessibility Plan, and the related Policies of our Organization, support and align with KAL's Values. These Values include dignity, supporting independence, integration, and equal opportunity for people with disabilities.

We seek to provide alternate ways to access our goods and services when a barrier is identified which inhibits accessing our goods and services for employees and for users of our services. Any alternatives identified will meet the requirements of the Canadian Air Regulations (CARs), as well as the requirements of Airside Security as required by regulation.

This Plan document, and the supporting KAL Policies, practices, and measures are intended to meet the requirements of the Accessible Canada Act, the Accessibility for Manitoban's Act, and the requirements for Accessibility as required by the Canadian Transportation Agency. These apply to all KAL employees, contractors, or volunteers performing work for KAL in Manitoba.

KAL is a medevac airline that serves our Government Customers via providing safe, efficient, and high-quality air ambulance and medevac services from some of Canada's most remote regions to health care centres in larger communities. The great majority our facilities are not open to the public. On occasion where we are providing service as a charter airline, we subscribe to the requirements of accessibility under the terms of our Licence with the Canadian Transportation Agency (CTA). Our Plan focuses primarily on ensuring we continue to uphold our current established programs and measures to ensure access to our facilities for employees. Ensuring accessibility for our employees also provides accessibility to our occasional Charter Passengers and Governmental visitors to our Administration Office facility.

KAL has been an early adopter of accessibility, and its importance in providing meaningful outcomes to stakeholders. We engaged and consulted with the Manitoba Accessibility Commissioner’s Office. The Office provided excellent advice on common issues that most frequently negatively impact accessibility to facilities and users of those facilities. Based on the advice and guidance of the Office, Keewatin Air LP developed a formal policy to put into writing the measures we had in place, improved our existing measures, and enhanced our training. Our policy and procedure to maximize accessibility for both customers and employees are described in the document: “Accessible Customer Service Policy, 15 January 2022-Revision 2-04 Dec 2023” which is posted on Keewatin Air LP’s website: www.keewatinair.ca / Company / Accessible Customer Service. A summary of our Policy is also visible at the entranceway to our head office facility at 50 Morberg Way, Winnipeg, MB in large print signage. A copy of this Plan Document is also available on our website: www.keewatinair.ca / Company / Accessible Customer Service.

1.3 Person Responsible

The person responsible for maintaining the Accessible Customer Service Policy & Plan is:

Keewatin Air LP

Director, Business Development and Strategic Planning

50 Morberg Way

Winnipeg, MB R3H 0A4

(204) 784-6524

jkliewer@keewatinair.ca

1.4 Requests for Alternate Formats of the Accessibility Plan, or Alternate Formats of the Description of the Feedback Process

Requests for an alternate format(s) of the KAL Accessibility Plan or of the Feedback Process can be made via the following methods:

- **In person:**

Keewatin Air

50 Morberg Way

Winnipeg, MB

Request to speak to: Director, Business Development and Strategic Planning

- **By Mail:**

Keewatin Air LP

50 Morberg Way

Winnipeg, MB R3H 0A4

Attention: Director, Business Development and Strategic Planning

- **By Phone:**

(204) 784-6524

- **By Email:**

jkliewer@keewatinair.ca

- **By Our Website:**

<https://www.keewatinair.ca/contact.html>

- **Social Media:**

- LinkedIn: <https://www.linkedin.com/company/12574157>

- Instagram: <https://www.instagram.com/keewatinair/>

1.5 Feedback Process

(A) Submitting Feedback

Feedback about our Plan may be provided by contacting:

- **In person:**

Keewatin Air

50 Morberg Way

Winnipeg, MB

Request to speak to: Director, Business Development and Strategic Planning

- **By Mail (Including Anonymous Feedback):**

Keewatin Air LP

50 Morberg Way

Winnipeg, MB R3H 0A4

Attention: Director, Business Development and Strategic Planning

- **By Phone (Including Anonymous Feedback):**

(204) 784-6524

- **By Email:**

jkliewer@keewatinair.ca

- **By Our Website:**

<https://www.keewatinair.ca/contact.html>

Feedback received, including anonymous feedback, is directed to management via our Safety Management System (SMS). This system enables us to capture the received feedback, assess and problem solve, assign actions, ensure actions occur, and report these to our Safety Committee.

(B) Acknowledgement of Feedback

Keewatin Air will acknowledge the Receipt of Feedback, other than anonymous feedback, to the sender via the same manner/methodology in which it was received.

Part 2: Employment

2.1 Barriers

Keewatin Air LP (KAL) was not able to identify barriers to employment at Keewatin Air.

2.2 Actions To Prevent Future Barriers

Keewatin Air LP will continue to adhere to our Equal Opportunity Employment Policy (Policy # B2). This policy came into force in January 2006, and was updated in March 2021. The policy provides:

- Keewatin Air LP hires, trains, promotes, and compensates all employees based on their personal competence and potential for advancement, without regard for: race, colour, religion, age, national or ethnic origin, gender declaration, marital status, family status, disability, or conviction for which a pardon has been granted.
- Our Equal Employment Opportunity Policy and philosophy applies to all aspects of employment with Keewatin Air LP, including recruitment, hiring, training, transfer, promotion, job benefits, pay, dismissal, educational assistance, and social/recreational activities.

Keewatin Air LP will also continue to support the measures as described in the Accessible Customer Service Policy which supports accessibility for staff and customers alike.

2.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to review any instances where an employment barrier is identified by either an applicant or existing employee. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP.

2.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 3: The Built Environment

3.1 Barriers

In consultation with the Manitoba Accessibility Office, Keewatin Air LP identified several potential barriers / common issues, including:

- i. Accommodating the Use of Assistive Devices
- ii. Collaborating with Support Persons
- iii. Supporting Access to our Premises for Service Animals
- iv. Maintaining Our Accessibility Features

3.2 Actions to Remove Barriers

To address and maintain an accessible workplace, the organization developed an Accessible Customer Service Policy in January 2022. The four Barriers identified above are within the Policy Document, as are our Practices to minimize and/or remove the barrier(s) listed in section 3.1, above. The specific measures are described in:

- Part 3 – Accommodating the Use of Assistive Devices
- Part 4 – Collaboration with Support Persons
- Part 5 – Support Access to Our Premises for Service Animals
- Part 6 – Maintenance of Accessibility Features at Public Facilities
- Part 8 – Training

Further, as the organization expands our Built Environment/Facilities in the future, maintaining and enhancing our accessibility to those facilities will be discussed and designed into the facility plans, in consultation with architectural and engineering firms. Keewatin Air LP will continue to consult with our stakeholders and review any developments or suggestions for improvements received. We will collaborate as needed to remedy any future barriers identified.

3.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to ensure the Accessible Customer Service Policy is upheld at Keewatin Air.

Further, it is the responsibility of the Keewatin Air Executive to review any instances where a Built Environment Barrier is identified by an employee or customer. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP.

3.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 4: Information and Communication Technologies (ICT)

4.1 Barriers

Keewatin Air LP (KAL) was not able to identify barriers to ICT at Keewatin Air.

4.2 Actions To Prevent Future Barriers

Keewatin Air LP will continue to consult with our stakeholders and review any developments or suggestions for improvements received. We will collaborate as needed to remedy any future barriers identified.

4.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to review any instances where an ICT barrier is identified. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP.

4.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 5: Communication, Other Than ICT

5.1 Barriers

In consultation with the Manitoba Accessibility Office, Keewatin Air LP identified several potential barriers / common issues, including:

- i. Meeting Communication needs by offering to Communicate using Alternative Methods
- ii. Collaborating with Support Persons

5.2 Actions To Prevent Future Barriers

To address and maintain an accessible workplace, the organization developed an Accessible Customer Service Policy in January 2022. The two Barriers identified above are within the Policy Document, as are our Practices to minimize and/or remove the barrier(s) listed in section 5.1, above. The specific measures are described in:

- Part 2 – Meeting Communication Needs
- Part 4 – Collaboration with Support Persons
- Part 8 - Training

Keewatin Air LP will continue to consult with our stakeholders and review any developments or suggestions for improvements received. We will collaborate as needed to remedy any future barriers identified.

5.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to review any instances where a Communication Barrier is identified. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP.

5.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 6: The Procurement of Good, Services, and Facilities

6.1 Barriers

Keewatin Air LP was not able to identify Barriers in relation to the Procurement of Goods and Services.

With respect to Facilities, Keewatin Air LP with the support of the Manitoba Accessibility Office, identified similar Barriers to our current (Built) Environment can similarly exist for those Facilities that we procure.

6.2 Actions To Prevent Future Barriers

In addition to the measures provided in Part 3 of this Plan, in procuring facilities, Keewatin Air LP reviews the accessibility of potential facilities items as part of our overall determination of suitability.

Items of consideration include:

- Assessing if there is space for people with mobility aids to move efficiently.
- Assessing if seating can accommodate persons of various builds/sizes and abilities.
- Assessing the Facility (Landlord's) plan/practice to remove obstacles and environmental hazards such as ice and snow.
- Assessing the accessibility features of the premises including but not limited to:
 - Wide Door Entrances and Exits
 - Automatic Doors Triggered by Motion
 - Tile or Low Pile Carpeting to support the use of mobility devices.
 - Accessible washrooms
 - Second floor Access via elevator
 - The inspection, cleaning and maintenance program supporting the facility.

Keewatin Air LP will continue to consult with our stakeholders and review any developments or suggestions for improvements received. We will collaborate as needed to remedy any future barriers identified.

6.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to review any instances where a Barrier to the Procurement of Goods, Services, and Facilities is identified. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP.

6.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 7: The Design and Delivery of Programs and Services

7.1 Barriers

Keewatin Air LP was not able to identify Barriers in relation to the Delivery of Programs and Services.

As an air ambulance / medevac provider, persons accessing our facilities are in acute medical distress and are non-ambulatory. The delivery of services is as prescribed by our Medical Team, in consultation with the Licensed Physicians who act as our Medical Directors.

The delivery of charter air services follows the prescribed requirements of the Canadian Transportation Agency, as well as the facility standards as described in our Accessible Customer Service Policy.

7.2 Actions To Prevent Future Barriers

Keewatin Air continues to consult with our stakeholders, including the Canadian Transportation Agency, Transport Canada and the Accessibility for Manitobans Office to ensure we are meeting the requirements for accessibility per the regulations, as well as ensuring the safety of our employees and service users. We review any developments or suggestions for improvements received.

7.3 Roles / Responsibilities

It is the responsibility of the Keewatin Air Executive Team to review any instances where a Program or Service Barrier is identified. The receipt, discussion, feedback to complainant, and any corrective actions taken are managed by the Director, Business Development and Strategic Planning under the Authority of the President/CEO of Keewatin Air LP. Where the barrier relates to the provision of medical services, consultation with our Medical Management and Medical Directors occurs.

7.4 Determining and Tracking Intended Outcomes

Complaints or potential improvements are tracked via our existing Safety Management System where the occurrence, investigation, root cause, corrective actions, and outcome can be managed ensuring the actions are completed.

Part 8: Transportation

8.1 Barriers

As a medevac/air ambulance service provider, we have incorporated Transportation with Part 7, Design and Delivery of Programs and Services.

Part 9: Provisions of CTA Accessibility Regulations

9.1 General

Keewatin Air LP (Keewatin) incorporates provisions of the Canadian Transportation Agency (CTA) where and when Keewatin is providing chartered air services (non-medevac/air ambulance charter passenger services).

9.2 Provisions of the CTA that are Not Applicable

- Accessible Transportation for Persons with Disability Regulations (ATPDR)

As small, charter air carrier that has a certified maximum carrying capacity of not more than 29 passengers, Keewatin is exempted the following parts of the ATPDR:

- Part 1
- Part 2
- Part 3
- Part 4
- Part 5

- Air Transport Regulations (ATR)

As small, charter air carrier that has a certified maximum carrying capacity of not less than 30 passengers, Keewatin is exempted the following parts of the Air Transport Regulations:

- Part VII

- Personnel Training for the Assistance of Persons with Disabilities Regulations (PTR)

Keewatin Air LP meets the requirements of the Personnel Training for the Assistance of Persons with Disabilities Regulations (PTR)

9.3 Activities Notwithstanding Exemptions or Inclusions

Notwithstanding the exemptions or inclusions as above, Keewatin Air LP has taken the important measures to ensure accessibility to our premises and aircraft that are incorporated into our Accessibility Policy. These accessibility measures benefit our occasional charter customers, as well as our current and future employees. These measures and the Section (Part) of our Accessibility Policy where they are incorporated include:

- Meeting Communication Needs (Part 2)
- Accommodating the Use of Assistive Devices (Part 3)
- Collaboration with Support Persons (Part 4)
- Support Access to our Premises for Service Animals (Part 5)
- Maintenance of Accessibility Features (Part 6)
- Feedback and Response to the Policy (Part 7)
- Training (Part 8)

Part 10: Consultation

10.1 General

As a Manitoba based organization, Keewatin Air LP worked with the Manitoba Accessibility Office commencing in 2021 to evaluate the current state of our accessible customer service measures, and their extension to provide a more accessible workplace for current and future employees. This consultation was extremely valuable as the suggestions and measures offered by the Manitoba Accessibility Office provided the organization with relevant information on barriers which exist for those with accessibility challenges.

The Manitoba Accessibility Office provided insight into assessing our current state, and desired future state for ensuring accessibility of our facilities for both customers and employees.

Consultation occurred via telephone conversations and participating in training which the Accessibility Office Provided to us, and finally, excellent templates and descriptive measures which we could incorporate into our overall Accessible Customer Service Policy.

10.2 Data Received

Specific areas which we garnered from the Manitoba Accessibility Office were:

- Communication Barriers faced by members of our society, and specific training and practices we could use to minimize and remove those barriers.
- Barriers faced by persons who used assistive devices (mobility devices) and specific training and practices we could use to minimize those barriers.
- Barriers faced by Support Persons carrying out their important role of improving the quality of life for those in their care, and specific training and practices on how to best collaborate with Support Persons in this important task.
- Barriers in accessing our premises for those requiring the support of Service Animals, and specific training and practices on how to accommodate Service Animals on our premises, and, when in the aircraft, accommodating the Service Animal according to the specifications of the Canadian Transportation Agency (CTA) and the Canadian Air Regulations (CARs)
- Assessing the barriers faced by customers and employees at our facilities, and specific training and measures that can be taken to provide full access to our facilities for all, as intended.
- Developing and integrating Feedback and Response Mechanisms into our Policy.
- Ensuring Training to support our leadership and employees is provided and enables us to deliver on our intended outcome of Accessibility for All.

- The importance of posting our Accessibility Policy on our Website and at our Entranceway (Large Print Signage) to clearly communicate our desire and steps taken to ensure Accessibility for All.

10.3 Summary

It is important to note that Keewatin Air LP is an airline that specifically provides air ambulance and emergency medical evacuation flights for some of Canada's most vulnerable communities. As such, our facilities are not open to the public, however an accessible facility enables employment opportunities.

Keewatin Air LP has been an early adopter of accessibility, and its importance in providing meaningful outcomes to stakeholders. Based on the advice and guidance of the Manitoba Accessibility Office, Keewatin Air LP developed a formal policy to put into writing the measures we had in place, improved our existing measures, and enhanced our training. Our policy and procedure to maximize accessibility for both customers and employees are described in the document: "Accessible Customer Service Policy, 15 January 2022 – Revision 1" which is posted on Keewatin Air LP's website: www.keewatinair.ca / Company / Accessible Customer Service. A summary of our Policy is also visible at the entranceway to our head office facility at 50 Morberg Way, Winnipeg, MB in large print signage.

Part 11: Training

11.1 Overview

We provide training on accessibility to all employees of Keewatin. Employees that are responsible for developing or implementing our Accessibility Plan or Accessible Customer Service Policy also receive training.

11.2 Practices to Support Training

We provide training to employees via our internal learning management system which is required to be completed as a new employee, and thereafter annual. The learning management system is used to record who has completed the training.

Our staff complete two courses:

- ***Sensitivity Awareness and Persons with Disabilities***. As a Federally Regulated Airline and Employer, licensed under the Canadian Transportation Agency (CTA) Federal Regulations this training is required includes:
 - Policies
 - Needs of Persons with Disabilities (Multiple such as blind/deaf-blind-hard of hearing, mobility challenged)
 - Accessibility for All
 - Providing Assistance
 - Assisting with Mobility Aids
 - Transferring a person from their own mobility aid to the air carrier aid, and from the air carrier aid to a passenger seat
 - Guiding a person with visual impairment, hearing impairment
 - Assisting a person with difficulty in balance, agility, or coordination

- ***Accessible Customer Service*** (The AMA Training Portal)
 - Manitoba's Accessibility Law
 - Requirements for Accessible Customer Service
 - Creating Accessibility for Customers
 - Continuing Your Learning