



**Accessibility Plan**  
**August 2023 to August 2026**

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**0.0 Amendment and Distribution Control**

<b>Record of Amendments</b>	
<b>Amendment Date</b>	<b>Entered by</b>
August 2023	Leanne McAmmond

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### 0.1 Amendment Control

- a) Can West Air is committed to ensuring the content of the Accessibility plan is clear and easy to understand. We will use concise language, simple sentences, and avoid technical words, jargon and acronyms whenever possible. Our goal is to make this information easily understandable to all readers.
- b) Amendments will be made by a complete reissue of this manual. There will be no list of effective pages maintained. A revision date in the footer will be used to indicate issuance date.

### 0.2 Distribution Control

This plan is available in digital format to our customers through our website, [canwestair.com](http://canwestair.com)

- a) Can West Air understands that access to our accessibility plan in alternate formats is required to accommodate diverse needs. Passengers and clients can request our plan in the following formats:
  - Print copies of the plan in the link above
  - Large Print formats, electronic or physical copies (standard available in 16pt, sans serif font unless otherwise requested)
  - Braille
  - Audio
  - Other electronic formats compatible with adaptive technology
- b) Please request these alternate formats through one of the communication channels listed below. We are committed to fulfilling requests for print or large print formats within 15 days, and within 45 days for braille, audio or other electronic formats. We encourage our passengers and clients to communicate any specific formatting needs, and will work with them to accommodate each individual's request and preferences.
- c) Any versions of this plan that are not directly from our website are current as of the date they are provided, and become uncontrolled upon distribution. Can West Air is not responsible to ensure they remain updated as the plans change.

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## 1.0 General

### 1.1 Purpose of this Plan

- a) Can West Air is committed to ensuring we provide equal access and opportunity for all staff and passengers, including those with disabilities.
- b) The purpose of this accessibility plan is to describe our plan for compliance with the applicable Accessibility Legislation and Codes of Practice. This plan will describe how we identify barriers, what we are doing to address these barriers, and our goals for continual improvement in accessibility.

#### Our Guiding principles in this plan are:

- All persons must be treated with dignity, regardless of disabilities
  - All persons must have the opportunity to barrier free access and participation in society, regardless of disabilities
  - All persons must have meaningful options and be free to make their own choices, with support if desired, regardless of disabilities.
  - Persons with disabilities must be involved in the development of laws, policies, programs, services and structures to ensure their perspective is understood
- c) Can West Air will seek to provide alternate ways when barriers are identified. Any alternatives used must still meet the requirements of the Canadian Aviation Regulations (CARs), safety standards, and other applicable regulations.
  - d) The goal of achieving full accessibility is a process. Can West Air will review and update this plan at least every 3 years, or more often as needed as new initiatives are added. We will continue to consult and review feedback with the goal of continual improvement.

### 1.2 Accessibility Contact

- a) Can West Air encourages feedback from our passengers, our employees, and other stakeholders. Feedback on our plan helps us remove barrier. The Chief Operations Officer receives feedback on accessibility through the Safety Management System. He may be contacted by email, telephone or post as follows:

Email: [accessibility@canwestair.com](mailto:accessibility@canwestair.com)

Phone: 1 (866) 849-5353

Mail: Attn: Safety Management System  
119, 1519 – 35 Avenue East  
Edmonton International Airport, AB T9E 0V6

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### 1.3 Feedback Process

- a) Can West Air will acknowledge, assess and act upon your feedback in a timely manner. If you provide contact information with your inquiry, we may reach out to consult with you for further feedback on the concern and any proposed changes.
- b) Routine reviews of the feedback messages will be conducted to identify patterns, themes or trends. Frequency of these reviews will depend on the volume of feedback messages received. Feedback will be incorporated into future progress reports and updated plans.

### 1.4 Definitions

The following are important terms in the ACA. They are used throughout this plan. They are defined here in plain language. For the full ACA definitions, visit: [Accessible Canada Act](#)

**Barrier:** Anything that might hinder people with disabilities' full and equal participation. Barriers can be architectural, technological, attitudinal, based on information or communications, or can be the result of a policy or procedure.

*A difficulty encountered during travel does not become a "barrier" merely because it was experienced by a person with a disability, there must be a direct connection between the disability and the barrier.*

**Disability:** Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.

**Accessibility:** The design of products, services, environments, technologies, policies and procedures in a way that allows all people, including those with disabilities, access them.

### 1.5 Applicable legislation and codes of practice

- Accessible Canada Act
- Canada Transportation Act
- Accessible Transportation Planning and Reporting Regulations
- Air Transportation Regulations Part VII
- Accessible Transportation for Persons with Disabilities Regulations
- Personnel Training for the assistance of persons with disabilities regulations
- CTA Accessibility Guidelines for Small Aircraft - Services for persons with disabilities on aircraft with 29 and fewer passenger seats

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## 1.6 Employment

- a) Can West Air LTD. is an Equal Opportunity Employer in accordance with the Employment Equity Act and the Canada Human Rights Act. The Quality Management Systems Manual section 9. Human Resources describes the organizations hiring policy.
- b) It is not considered discriminatory if there are limitations to employment based on bona fide occupational requirements, such as the requirement for a flight crew member to hold and maintain a valid Aviation Medical of the correct class.
  - **Recruitment**
    - All job posting indicate the organization is an equal opportunity employer
    - During the interview process accessibility to accommodations are available on request to support candidates participation
    - When offering a position to a successful candidate we are committed to remove barriers and provide accessibility in the work environment
  - **Training**
    - The Quality Management System Manual section 7.0 Training and Proficiency, General, describes the organizations training policies and curriculums
    - The organization is committed to provide training in accordance with the Canadian Labour Code as it applies to people with disabilities
    - To meet this goal, Accessibility training will be provided to all new hires and current employees

### **Actions Implemented to Remove Human Resource Barriers**

- Instances of employment barriers identified by an applicant or an existing employee are reported to the Safety Management System and addressed by the Chief Operating Officer in a timely manner

### **Actions to Remove Identified Training Barriers**

- An Accessibility training program will be developed and delivered to all company employees.
- The Quality Assurance system will monitor Accessibility training development and delivery to ensure it is implemented and effective

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## 2.0 Communication

- a) Can West Air recognizes that effective communication is critical to a positive travel experience for all persons, including those with disabilities. Clear, concise and accessible communication is critical to ensuring comfort, safety and satisfaction. With clear communication, we strive to alleviate anxiety, frustration, and to address concerns promptly.
- b) Our goal is to continually improve our communication processes through training and seeking feedback from customers, staff and other resources.
- c) Communication is divided into two primary elements for this accessibility plan: Information and Communication Technology (ICT), and Communication other than ICT

### 2.1 Information and Communication Technologies (ICT)

- a) Information and Communication Technology includes the accessibility of all telecommunication systems, computer systems and networks owned, operated or controlled by the organization. This also includes websites, mobile applications, and any announcements made in terminals or onboard the aircraft.

#### Actions Implemented to Remove Communication Barriers

- Onboard aircraft briefings are performed before engines are started
- Company information web site available to the public
- Communications with the company by phone, email and web site
- Aircraft safety briefing videos that include audio and written safety information

#### Actions to Remove Identified Communication Barriers

- Perform a review of the web site to ensure it is compatible with adaptive technology and WCAG 2.2
- Perform a review of the passenger booking process to ensure it is accessible
- The Quality Assurance system will monitor required changes to the web site and the current booking process to ensure they are implemented and effective



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## 2.2 Communication Other Than ICT

- a) Communication other than ICT addresses other areas of communication, including spoken, written, signed and other forms of communication.
- b) Company personnel provide check in service and in flight service. When asked, company personnel will individually brief or help a passenger requiring additional assistance.

### **Actions Implemented to Remove Communication Barriers**

All current staff and new hires receive communication training delivered by an external training provider.

#### **Verbal Communication:**

- Staff will communicate in a clear and courteous manner, using simple and easily understandable language.

#### **Written Communication:**

- We will utilize clear and concise written materials, avoiding complex terminology or jargon.

#### **Non-Verbal Communication:**

- We will encourage our employees to use appropriate gestures, body language, and facial expressions to facilitate understanding

#### **Visual Communication:**

- We will provide visual aids and clear signage to assist passengers.
- Informational displays and visual announcements will be available to ensure vital information is accessible to all.

#### **Gestural Communication:**

- Where feasible, we will incorporate universally recognized gestures into our communication practices

#### **Tactile Communication:**

- We will ensure our staff is attentive to the needs of passengers who rely on tactile communication.
- Sensitivity and respect will be exercised when providing physical assistance, such as guiding passengers or using tactile aids.

### **Actions to Remove Identified Communication Barriers**

- An Accessibility training program will be developed and delivered to all company employees.
- The Quality Assurance system will monitor Accessibility training development and delivery to ensure it is implemented and effective
- Identify resources for translators including sign language

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### **3.0 Procurement of Goods, Services and Facilities**

Currently Can West Air does not have formal policies associated to the procurement of goods, services and facilities relating to accessibility issues

#### **Actions to Remove Identified Procurement of Goods, Services and Facilities Barriers**

- Can West Air will audit their procurement practices, services and facilities and recommend changes where accessibility issues are identified. When procuring new equipment or facility improvements, accessibility will be a consideration and will be communicated to suppliers and contractors.
  - Determine if there is space for people with mobility aids to move efficiently.
  - Determine if seating can accommodate persons of various builds/sizes and abilities.
  - Determine the Facility (Landlord's) plan/practice to remove obstacles and environmental hazards
    - Evaluate the accessibility features of the premises including but not limited to:
      - Wide Door Entrances and Exits
      - Automatic Doors Triggered by Motion
      - Tile, Low Pile Carpeting or similar flooring to support the use of mobility devices.
      - Accessible washrooms
      - The inspection, cleaning and maintenance program supporting the facility
- The Quality Assurance system will monitor the recommendations of the audit to ensure they are practical, implemented and effective

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#### 4.0 Design and Delivery of Programs and Services

- a) Can West Air's operations as an Air Ambulance provider means that the majority of patients accessing our facilities are in acute medical distress and are non-ambulatory. The delivery of services is performed as required by our Air Medical Crew, in conjunction with Alberta Health Services guidance. The delivery of this service is done in a manner that takes into account the condition of each individual patient and their needs, including accessibility, through the lens of medical care.
  
- b) CanWest Air's operations as a charter utilizes Cessna C208B and Cessna 206 aircraft for charter operations. Charter flights are contracted through our Customer Service Representatives, and are physically limited by the aircraft fleet. CanWest Air offers custom charter solutions to meet the demands of our customers, working within the parameters of the Canadian Aviation Regulations and other legislative requirements. CanWest Air requests that our customers inform of any challenges or barriers that they might encounter at the time of booking a flight, and continue to work with the company to find a solution that works for their needs.

#### **Actions Implemented to Remove Delivery of Programs and Services Barriers**

With advanced notice, Can West Air will ensure that services are provided to Persons with Disabilities. Staff assist with:

- Registration at the check-in counter and guiding customers to the boarding area.
  - Boarding and deplaning as well as stowing and retrieving carry-on baggage and checked baggage.
  - Navigating to the general public area or to another carrier.
  - Transferring a passenger between their own mobility aid and one provided by Can West Air.
  - Transferring a passenger between a mobility aid and their seat.
  - We inquire periodically during a flight about a person's needs.
  - We brief individual passengers with disabilities and their attendant on emergency procedures.
- b) Mobility aids and medical equipment can go on the aircraft with the passenger. Due to space limitations on some aircraft, Can West Air may not be able to accommodate some battery-powered mobility aids. Check in staff will provide passengers with more information at the time of booking.
  
  - c) Can West Air may offer a Medevac aircraft configuration for persons requiring that type of service. Two flight crew may be provided on aircraft requiring a single pilot allowing the additional flight crew member the ability to assist the passenger.

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- d) Passenger briefing cards are accessible and clear contrasting designs, pictographs, emergency equipment labeled for use
  - e) Service Animals may be accommodated but, they must remain on the floor at the person's seat and they must be properly harnessed. Staff will provide directions to animal relief areas at the various locations.

**Actions to Remove Identified Delivery of Programs and Services Barriers**

Can West Air will audit each of its facilities to determine if additional mobility aids are required

- Wheelchairs
- Walkers
- Canes
- Crutches
- Signage for animal relief areas
- Other
- The Quality Assurance system will monitor the results of the Delivery of Programs and Services audit to ensure they are practical, implemented and they are effective (Should a timeline be added)
- The Delivery of Programs and Services equipment and processes are regularly inspected by the Workplace Health and Safety Committee and by employees reporting issues to the Safety Management System. A Hazard Risk Assessment matrix is used to determine the probability and severity of a reported risk

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**5.0 Transportation Services**

- a) Can West Air utilizes King Air aircraft and Cessna C208B aircraft for Air Ambulance operations, which are fully equipped to load and transport a patient with any accessibility concerns in a non-ambulatory state. Our crews are trained in the loading, unloading and equipment operations, as well as in the cooperative loading of patients with respect to dignity, comfort and providing the most positive experience possible for the occurrence.
- b) Can West Air utilizes Cessna C208B and C206 aircraft for charter operations. These aircraft have unique limitations for accessibility of those with mobility restrictions. Due to space limitations on some aircraft, Can West Air may not be able to accommodate some mobility aids. Check in staff will provide passengers with more information at the time of booking.
- c) Can West Air does not provide ground transportation services for customers arriving at or departing the airport. When requested, employees will assist passengers in obtaining ground transportation and assist with the handling of baggage and special equipment.

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## 6.0 The Built Environment

- a) The “built environment” impacting accessibility includes company buildings, the airports we fly to, and the outside environment where passengers embark and disembark from our aircraft. Aircraft are addressed separately under the Transportation Category
- b) Can West Air operates flights from a variety of locations, including our own bases with company hangars and movement areas such as Fort Vermillion, leased spaces such as Edmonton, and outdoors at remote airports such as Fox Lake. Each of these unique environments have their own challenges and barriers. Can West Air cannot control elements such as weather, snow, and surface conditions at remote locations, however staff will do their best to coordinate with local airport management and maintenance to ensure that these spaces are suitable for passenger use, including those with disabilities. At our home bases, challenging weather can be combatted by the flight crew bringing the aircraft into the hangar for a controlled environment in which to load and unload.

### Actions to Remove Identified Built Environment Barriers

- Can West Air commits to the inclusion of accessibility features and removing accessibility barriers during new builds or renovations. An audit of the existing facilities will be performed to determine if additional accessibility features are required and if there are barriers to be removed. Items to be considered are:
  - Bathrooms
  - Doors and stairs
  - Parking lots, disabled parking areas
  - Fire alarms visual and audible,
  - Desks/workstations for workers
  - Lighting
  - Signage
  - Seating and furniture
  - Support for service animals at our facilities (identification of relief areas).
- The Quality Assurance system will monitor the results of the Built Environment audit to ensure they are practical, implemented and they are effective (Should a timeline be added)
- The Delivery of Programs and Services equipment and processes are regularly inspected by the Workplace Health and Safety Committee and by employees reporting issues to the Safety Management System. A Hazard Risk Assessment matrix is used to determine the probability and severity of a reported risk

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## 7.0 Provisions of CTA Accessibility-Related Regulations

As a small Transportation Service Provider, Can West Air is subject and fully compliant to the:

- Air Transportation Regulations, Part VII (for air carriers not captured under the Accessible Transportation for Persons with Disability Regulations (ATPDR)
- The Personnel Training for the Assistance of Persons with Disabilities Regulations (for all Transportation Service Providers not captured under the ATPDR).

Can West Air currently meets the definition of a “small air carrier” under the Air Transportation Regulations. We do not foresee this changing in the near future.

- **small aircraft** means an aircraft equipped for the carriage of passengers and having a certificated maximum carrying capacity of not more than 39 passengers

Compliance with these regulations shall be maintained by the Quality Assurance Program described in the Maintenance Control Manual section 8.0

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## 8.0 Consultations

### 8.1 Internal Consultations

- a) Can West Air provides medevac air ambulance services and charter services to remote communities in Alberta. This air ambulance service has provided the company with many years of experience assisting persons with disabilities. Can West Air has communicated with these people, their assistants, medevac personnel and Alberta Health Services and have implemented changes based on their recommendations, improving the service we provide.
- b) The company Occupational Health and Safety Committee has solicited input from employees and has performed safety audits regarding safety related accessibility issues and barriers.
- c) We are also COR Safety (Certificate of Recognition) certified and received a score of 97% in the 2022 certification audit. The COR audit process interviews company management and employees regarding safety and accessibility/barrier issues and improvements.
- d) The companies Safety Management System provides a mechanism for employees, clients and stakeholders to anonymously report accessibility issues and barriers. These issues are reviewed by management and/or the safety committee and corrective actions are implemented.
- e) Can West Air has reviewed the Consultation section of other Air Operators Accessibility Plans to gain further insight to the needs of persons with disabilities
- f) The above Best Practices are a well-established aspect of the company culture and are an ongoing continuous improvement process driven by the Quality Assurance Program.

### 8.2 External Consultations

An interview was conducted with an adult with Epilepsy. The main areas of concern are:

- Passenger would require an aisle seat in event of a seizure and would need to be able to lay on the floor during a seizure
- Staff would need to know not to restrict the persons movements during a seizure
- Training should include “situational awareness” where flight attendants monitor passengers for physical or mental concerns. Epileptic seizures have a pre-seizure “Aura” phase where the person loses focus and may not be able to communicate
- A procedure to legally search a person or the persons personal belongings for identification information
- Post seizure requires the following:
  - A quiet place to regain focus
  - Staff to stay with the person until medical assistance or family arrives
  - Staff to care for a child or service animal if required



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- Staff to clean bodily fluids if required
  - Staff to assist with navigation to washroom, quiet area, medical area, or other areas

An interview was conducted with the parents of an adult with Cerebral Palsy. Cerebral Palsy introduces cognitive and physical limitations. The main areas of discussion or concern are:

- The parents felt the airports and airlines in Canada provided good service and accommodations for their needs. Travels in the 3<sup>rd</sup> world were much more difficult
- In Canada all staff were helpful with check-in, boarding, off-loading, use of special lines to the gate, over size baggage and all other needs
- Airports and airlines had mobility aids available such as a small wheel chair for use in the aircraft

The main areas of concern are:

- Washrooms in the airport do not have a lift system to lift person out of the wheel chair on to the toilet. They understand this is not possible on the aircraft.
- The small wheel chair for use in the aircraft does not have a restraining system to prevent falls. This has been an issue with their child. A full size wheel chair with restraining will not navigate around the corner when entering a large airliner
- When airlines provide bulkhead seats the armrests are stationary and the parents/flight attendants have difficulty moving the person from the wheel chair to the seat.
- Stationary armrests do not allow the disabled person to stretch out making the person difficult to attend to on longer flights
- They suggested airlines could reserve the second-row seats for persons with disabilities. This row would have more distance from the row ahead allowing room to maneuver the person and would have movable armrests

An interview was conducted with an adult with hearing impairment. The main areas of concern are:

- Noisy environments for passenger briefings will lead to inability to understand
- Face mask use impairs understanding
- Passenger briefing cards must be available
- Captions on video briefings are useful
- Visual indications instead of verbal direction on the ramp area is important to safety
- Written information on charter details are important for clarity of communication

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## 9.0 Training

Our programs and services depend on our staff being able to deliver the expected services. Can West Air provides staff training meeting the requirements of the Accessible Transportation for Persons with Disabilities Regulations to ensure our staff can meet our passengers' needs.

### 9.1 Staff training around Accessibility includes:

- a. Understanding that all persons must be treated with dignity regardless of their disabilities
- b. all persons must have the same opportunity to make for themselves the lives that they are able and wish to have, regardless of their disabilities or of how their disabilities interact with their personal and social characteristics
- c. all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities
- d. all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities
- e. Identification of barriers that may hinder equal access to transportation services for persons with disabilities
- f. various types of assistance that may be needed by persons with disabilities and the duties of Can West Air and the front line staff in relation to those needs, including
  - i. the type of assistance that they must provide to persons with disabilities
  - ii. assistive devices that are commonly used by persons with disabilities
  - iii. methods of communication that may be used by, or may facilitate communication with, persons with disabilities, such as an augmentative or alternative communication system, sign language or clear, concise and plain language;
- g. Communication with persons with communication disabilities, particularly if the person is blind or deaf or has any other visual, hearing or communication impairment and how to interact with them in a manner that respects their autonomy and dignity
  - iv. Understanding use of an assistive device for communication
  - v. Other methods of communication that may be used such as interpretive devices, sign language, gestures, written or audible format documents, or clear/concise/plain language.
- h. The role of a support person
- i. The role and needs of service dogs
- j. If providing physical assistance to a person with a disability, staff will be trained to carry out those functions, including

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- vi. Seeking information from the person with respect to what they need, methods of assistance and other measures they may require to ensure their safety and comfort
  - vii. Maneuvering mobility aids through doors and on irregular and multi-level surfaces, steps, curbs and elevators
  - viii. Transferring the person from their mobility aid and the passenger seat, including lifting techniques that take into consideration dignity, safety and comfort
  - ix. Guiding and orienting a person whose impairment affects their mobility
  - x. Assisting a person who has limitations in balance, agility or coordination
  - k. If handling mobility aids, personnel will be trained on the different types of aids, and requirements and appropriate methods for transporting and storing mobility aids, including the disassembling, packaging, unpackaging and reassembling of mobility aids
  - l. If a staff member is using any other special equipment, including telecommunication devices, lifts, ramps, onboard medical equipment, etc. they shall be trained in the operation of such devices.
- 9.2** Initial training is required to be completed within 60 days of assuming accessibility relevant duties or tasks, and recurrent training is required every 36 months minimum. Untrained personnel may carry out the functions under the direct supervision of a person who has completed their training.

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## **10.0 Accessibility Plan Action Items**

### **1.0 General**

- Develop and deliver an Accessibility training program to all company employees.

### **2.0 Communication**

- Perform a review of the web site to ensure it is compatible with adaptive technology and WCAG 2.2
- Perform a review of the passenger booking process to ensure it is accessible
- Identify resources for translators including sign language

### **3.0 Procurement of Goods, Services and Facilities**

- Conduct an audit of the current procurement practices, services and facilities and recommend changes

### **4.0 Design and Delivery of Programs and Services**

- Audit each facility to determine if additional mobility aids are required

### **5.0 Transportation**

- No action items

### **6.0 The Built Environment**

- Audit each facility to determine if additional accessibility features are required and if there are barriers to be removed.

### **7.0 Provisions of CTA Accessibility – Related Regulations**

- No action items

### **8.0 Consultations**

- No action items

### **9.0 Training**

- Develop and deliver an Accessibility training program to all company employees.

### **10.1 Quality Assurance Action Items**

- Produce one or multiple Document Amendment Request forms for these action items
- Incorporate the Accessibility Policy and Plan into the Quality Management System manuals
- The Quality Assurance system will monitor the above action items to ensure they are implemented and are effective

CanWest Air commits to implementing an action plan, develop audit criteria and conduct the applicable audits, and have a corrective action plan in place by August 2024.

This program will be reviewed every 3 years, or more frequently as identified in the Quality Assurance Program