

Accessibility Plan Progress Report

Progress Report 2 – 06 May 2025

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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, Progress Report(s) 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 Progress Report document is 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.

KAL is a medevac air operator 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 majority of our facilities are not open to the public. On rare occasion where we are providing service as a charter air operator, 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 accessibility's importance in providing meaningful outcomes to stakeholders. In developing our Plan, we engaged and consulted with the Manitoba Accessibility Commissioner's Office. This 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 1 - 04 Dec 2023" which is posted on Keewatin Air LP's website: www.keewatinair.ca. 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 Accessibility Plan Progress Report, #2, as well as Progress Report #1, is also available on our website: www.keewatinair.ca.

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

jkliwer@keewatinair.ca

1.4 Requests for Alternate Formats of the Accessibility Plan, Accessibility Plan Progress Report(s), or Alternate Formats of the Description of the Feedback Process

Requests for an alternate format(s) of the KAL Accessibility Plan, Plan Progress Report(s) 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: Information and Communication Technologies (ICT)

2.1 Action Item(s) per our Plan

In our Plan document, Keewatin Air KP committed to continuing to consult with our stakeholders and review any developments or suggestions for improvements received about our Information and Communication Technologies (ICT) and, to continue to collaborate as needed to remedy any future barrier identified.

2.2 Barriers

Keewatin Air LP (KAL) received feedback from the Canadian Transportation Agency (CTA) noting improvements could be made to the wording of our Accessibility Plan Report # 1, as published on our website.

Specifically, the CTA noted:

The word “Consultation” has been used in the document as a heading, where Provision 12 (1) (c) required the use of the word “Consultations” (plural).

2.3 Corrective Actions to Address Barriers

Keewatin Air LP (KAL) quickly sought to address the feedback from the CTA, specifically:

- a. The heading “Consultation” was changed to “Consultations”.
- b. The amended (revised) Accessibility Plan Progress Report # 1 was posted onto the KAL website.
- c. The CTA/CHRC and were notified of the change and republished Report.

2.4 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.

2.5 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 CEO of Keewatin Air LP.

2.6 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: Communication, Other Than ICT

3.1 Action Item(s) per our Plan

In our Plan document, Keewatin Air LP committed to continuing to consult with our stakeholders and review any developments or suggestions for improvements received about our Communication, other than ICT; and, to continue to collaborate as needed to remedy any future barrier identified.

3.2 Barriers

Keewatin Air LP noted some opportunity existed to improve our communications per the *Inuit Language Protection Act*. These are noted in Part 4 of this report.

3.3 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.

3.4 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 CEO of Keewatin Air LP.

3.5 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: The Procurement of Goods, Services, and Facilities

4.1 Action Item(s) per our Plan

In our Plan document, Keewatin Air LP committed to continuing to consult with our stakeholders and review any developments or suggestions for improvements received in regard to our Procurement of Goods, Services, and Facilities; and, to continue to collaborate as needed to remedy any future barrier identified.

4.2 Barriers

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

With respect to the Procurement of Facilities, Keewatin Air LP has set of goal of furthering our signage and communication material to include and incorporate the intentions of the *Inuit Language Protection Act* by ensuring that we are able to effectively communicate with a patient (a potentially unilingual patient) in the official language of Nunavut as spoken by the patient. While not effected by a hearing or oral speaking challenge (ex. Hearing loss), the inability for persons to properly read and understand the signage in our facilities has a similar (or “like”) effect of presenting an accessibility barrier.

Our considerations for corrective actions include:

- The signage in our facilities can incorporate pictographs that can be universally understood.
- Where pictographs are not feasible, signage can be modified to include Inuktitut syllabics.

4.3 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.

4.4 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 CEO of Keewatin Air LP.

4.5 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: The Design and Delivery of Programs and Services

5.1 Action Item(s) per our Plan

In our Plan document, Keewatin Air KP committed to continuing 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 were to review any developments or suggestions for improvements received.

5.2 Barriers

As identified in Part 4, Keewatin Air LP has set of goal of furthering our signage and communication material to include and incorporate the intentions of the *Inuit Language Protection Act* by ensuring that we are able to effectively communicate with a patient (a potentially unilingual patient) in the official language of Nunavut as spoken by the patient. While not effected by a hearing or oral speaking challenge (ex. Hearing loss), the inability for persons to properly read and understand the signage in our facilities has a similar (or “like”) effect of presenting an accessibility barrier.

Our considerations for corrective actions for providing our services include:

- The signage in our aircraft can incorporate pictographs that can be universally understood, where this is acceptable to Transport Canada.
- Where pictographs are not feasible, signage can be modified to include Inuktitut syllabics.
- We will investigate the feasibility of providing pre-flight briefings to unilingual Nunavut residents via electronic means (announcements/i-pad video).

5.3 Actions To Prevent Future Barriers

Keewatin Air LP will continue to consult with our stakeholders, including but not limited to 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.

5.4 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 CEO of Keewatin Air LP. Where the barrier relates to the provision of medical services, consultation with our Medical Management and Medical Directors occurs.

5.5 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: Transportation

6.1 Barriers

As a medevac/air ambulance service provider, we have incorporated Transportation with Part 5, Design and Delivery of Programs and Services.

Part 7: The Built Environment

7.1 Action Item(s) per our Plan

In our Plan document, Keewatin Air LP committed to continuing to consult with our stakeholders and review any developments or suggestions for improvements received in regard to our Built Environment; and, to continue to collaborate as needed to remedy any future barrier identified.

7.2 Barriers

Keewatin Air LP proactively self-identified the washroom facilities at 50 Morberg Way needed upgrading, and that further amenities which would support accessibility could be added to the new washrooms.

7.3 Corrective Actions to Address Barriers

To address and maintain our accessible facilities, the organization hired a contractor to upgrade the washroom facilities. Signage was provided to note the temporary closure of the existing washrooms, and temporary washrooms were secured to ensure continuity of facilities.

The improvements to the washrooms were completed in March 2025 and included:

- Increasing the number of unisex washrooms from two to five.
- Designated one of the washrooms as family/mobility friendly including a wider door, automatic/mechanical opening closing, assistance railings, the inclusion of a baby changing station.
- Including a baby changing station in another washroom.
- Replacing the legacy signage with new signs that contained: Larger Print, Pictographs, and Braille.

No feedback from customers or staff was received that indicated an individual was negatively affected during the modifications, and the feedback since the completion of the upgrades has been positive.

7.4 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.

7.5 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 CEO of Keewatin Air LP.

7.6 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: Provisions of CTA Accessibility Regulations

8.1 General

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

8.2 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 Air LP 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 Air LP 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)

8.3 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 9: Feedback Information

9.1 General

Keewatin Air LP (KAL) feedback mechanisms are provided in our Plan Document, as well as in this Progress Report in Part 1.

Over the reporting period, KAL received one (1) formal feedback pieces:

- a. Feedback from the Canadian Transportation Agency (CTA) a heading in our Progress Report was singular, where it should have been plural, as previously reported in Part 2 of this report.
- b. Feedback from the CTA that a review of our Corrective Action Measures per item (a), above, fully met the aligned Regulations.

9.2 Consideration

Keewatin Air LP (KAL) gave the feedback received priority consideration and, as described previously in this document, developed, and implemented a corrective action plan to eliminate the identified barrier with a minimum of time to the satisfaction of the party providing the feedback.

Part 10: Consultations

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 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.

Consultations 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 Polic

- 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 Ongoing Consultations

As reported in Progress Report 1, KAL is a member of several industry associations. As such, KAL can benefit from the activities of our strategic partners and associations. For example, KAL is a member and has a seat on the Board of Directors with the Northern Air Transportation Association (NATA).

In Progress Report 1, KAL noted that on 09 May 2024, NATA's Executive Director attended a National Air Accessibility Summit in Ottawa, where approximately 100 stakeholders including accessibility advocates, the industry, and local / national associations met to discuss the current state of accessibility in the aviation sector.

Attendees at this Summit included:

- The Honourable Pablo Rodriguez
- The Honourable Kamal Khera
- Craig Hutton – Associate Assistant Deputy Minister, Transport Canada
- France Peugeot – Chair and Chief Executive Office, Canadian Transportation Agency
- Philip Rizcallah – Chief Executive Officer, Accessibility Standards Canada
- Robert Fenton – Chair, CNIB
- Dr. Jonathan Lai – Autism Alliance of Canada
- Jewelles Smith – Procne Navigation
- Joanne Smith – Spinal Cord Injury Ontario
- Christopher Sutton – Wavefront Centre for Communication Accessibility
- Josh Vander Vies – Vancouver International Airport
- National Airlines Council of Canada
- Canadian Airports Council

- Northern Air Transport Association
- Air Canada
- WestJet
- Canadian Union of Public Employees
- UNIFOR
- Canadian Air Transport Security Authority

A report was received from the NATA Executive and was reviewed by KAL for the identification of opportunities to further enhance our accessibility efforts. The essence of this report was that KAL should continue to abide by and implement any deficiencies we identify through our current feedback processes.

It is noteworthy to add that a second National Air Accessibility Summit will be occurring in May 2025, which we will participate in via our association to NATA. KAL will seek to garner information from that summit that can further inform us of opportunities to improve.

10.4 Summary

It is important to note that Keewatin Air LP is an air operator 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. Our policy and procedures support maximizing accessibility for both customers and employees.