

# Accessibility Plan Progress Report

Progress Report 1 – 27 May 2024  
Amended 11 October 2024

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KEEWATIN AIR LP

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## Part 1: General

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### 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](http://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 is also available on our website: [www.keewatinair.ca](http://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](mailto: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](mailto: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.



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## **Part 2: Information and Communication Technologies (ICT)**

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### **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 in regard to 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 and display of our Accessibility Plan on our Website.

Specifically, the CTA noted:

- a. The General Section of our Accessibility Plan required a statement of the means by which the public can provide feedback and request an alternate form of the description of the feedback process.
- b. The KAL website homepage or home screen should contain a link to the accessibility plan on the digital platform either directly on the homepage or home screen by way of a hyperlink from that homepage.
- c. The KAL website homepage or home screen should contain a link to the description of the process for receiving feedback via the homepage or home screen by way of a hyperlink from that homepage.
- d. The CTA must be notified of the publication of a new Accessibility Plan within 48 hours.

### **2.3 Corrective Actions to Address Barriers**

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

- a. The General Section was updated.
- b. Per Section 5(1) of the ATPRR, the Accessibility Plan and Feedback process was made accessible directly on the home page/screen via means of a hyperlink from the home page screen.

- c. Per Section 9(1) of the ATPRR, for the purposes of subsection 61(2) of the Act, the process for receiving feedback is also published on the on the home page/screen via means of a hyperlink from the home page/screen.
- d. The CTA was notified of the republishing of the Accessibility Plan within 48 hours.

The changes to the website were published on 08 Jan 2024, and the CTA/CHRC were notified of the changes on 09 Jan 2024.

## **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.

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## **Part 3: Communication, Other Than ICT**

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### **3.1 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 in regard to our Communication, other than ICT; and, to continue to collaborate as needed to remedy any future barrier identified.

### **3.2 Barriers**

Keewatin Air LP was not able to identify Barriers in relation to Communication other than ICT and received no feedback in regard to Barriers in Communication other than ICT during the reporting period.

### **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.

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## Part 4: The Procurement of Goods, Services, and Facilities

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### 4.1 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 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 proactively collaborated with our design consultants, and incorporated several design elements into the expansion plans of our facilities at 50 Morberg Way, Winnipeg, MB. These design elements are intended to reduce and/or eliminate potential future accessibility barriers, including:

- a. Wide doors;
- b. Doors operated by switch;
- c. Wide hallways;
- d. Floor with tile or hard surfaced to enable the ease of movement for those persons using mobility devices;
- e. Incorporating an additional door /hallway into our expansion design which enabled access to an elevator for people who would benefit from that feature,
- f. Accessible washrooms; and,
- g. Incorporating Exit Signage that met the ISO standard for Exist Signs (green pictogram and a white tinted graphical symbol).

### 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.

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## **Part 5: The Design and Delivery of Programs and Services**

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### **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**

Keewatin Air LP proactively collaborated with a customer to incorporate several design elements into the specifications of an air ambulance for the specific use of that customer. The design elements were intended to support the accessibility of larger bodied (bariatric) patients to our aircraft while also supporting medical crew safety. The design elements included:

- a. The installation of floor adjustment mechanisms which enable the base stretcher unit to be positioned towards the centerline of the aircraft, maximizing patient comfort/safety.
- b. The installation of low friction rolling surfaces which enable the patient to be quickly moved onto / off of the stretcher base with a minimum of lifting / effort, maximizing patient comfort/safety. This is also used for non-bariatric patients to realize the same benefits.
- c. The installation of powered and adjustable loading ramp mechanisms to enable the patient to be transferred from the ground unit to the air unit with a minimum of lifting / effort maximizing patient comfort/safety. This is also used for non-bariatric patients to realize the same benefits.
- d. The installation of one additional seat to the floor plan which could accommodate an additional escort/support person.

### **5.3 Actions To Prevent Future Barriers**

Keewatin Air 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.

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## Part 6: Transportation

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### 6.1 Barriers

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



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## **Part 7: The Built Environment**

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### **7.1 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 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 paving stones at the customer entrance to our facility at 50 Morberg Way Winnipeg had sunk below an acceptable level due to soil erosion. The possibility existed that a customer could be inconvenienced by having to strain to move a mobility device (wheelchair) or a push style cart into our facility. Further, we anticipated that if left unchecked, the paving stones would continue to sink over the coming weeks and would eventually represent a tripping hazard.

### **7.3 Corrective Actions to Address Barriers**

The barrier was noted on Thursday 20 July 2023. To address and maintain our accessible facilities, the organization immediately hired a contractor to correct the condition of the paving stones. The repair was completed on Monday 24 July 2023.

No feedback from customers or staff was received that indicated an individual was affected by the displaced pavers, either prior to, or following the repair.

### **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.

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## Part 8: Provisions of CTA Accessibility Regulations

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### 8.1 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).

### 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 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)

### **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)

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## Part 9: Feedback Information

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### 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 four (4) formal feedback pieces:

- a. Feedback from the Canadian Transportation Agency (CTA) that our measures related to Information and Communication Technologies could be improved, as previously described in the Progress Report,
- b. Feedback from the CTA that the wording of our Plan could be improved,
- c. Feedback from the CTA to ensure our Notification of Publishing of Accessibility Documents were timely; and,
- d. Feedback from the CTA that a review of our Corrective Action Measures 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.

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## Part 10: Consultations

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### 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 a member of several industry associations, Keewatin Air LP (KAL) is able to 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 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. A report from the NATA Executive is being reviewed by KAL for the identification of opportunities to further enhance our accessibility efforts. Any opportunities noted will be added to our future Progress Reporting.

### 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.