



Accessibility Plan

2023-2026

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SECTION 1 Administration

Manual Distribution

The Accessibility Plan will be kept electronically and made available to all staff. Current and Controlled copies will be located in the follow two (2) locations.

- On the Company Intranet (Library Drive)
- On the Company Webpage (Link at bottom)

Any printing of this manual, whether in its entirety or partial, is considered uncontrolled and should be disposed of.

Amendments

Amendments to this Accessibility Plan will be issued by the Human Resources (HR) Manager or designate. Upon changes to the manual, the HR Manager or designate will re-issue the plan with a new amendment revision number, a new date and each change will be identified by a change bar in the right margin. The Amendment Record Sheet will also be updated.

Amendment Record Sheet

Rev No.	Date of Amendment	Date Entered	Entered By
2023-01	2023-05-17		Marilu M.
2023-02	2023-11-30	2023-12-1	Marilu M.

Glossary

Barrier: anything, including anything physical, architectural, technological, or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice, that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

Disability: any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation, whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

Section 2 General

Executive summary

Carson Air is the primary provider of fixed wing air ambulance services in British Columbia, operating out of bases in Kelowna (head office), Fort St. John, Prince George and Vancouver, BC. We also provide cargo service from Calgary, AB and flight training from Kelowna, BC. Carson Air supports a culture that embraces diversity and inclusion that enable the full participation of our employees in the delivery of our activities.

The Canadian legislative framework that supports diversity and inclusion was strengthened by the addition of the *Accessible Canada Act* (ACA or the Act) to ensure a barrier-free Canada. This document sets out the Carson Air’s plan over the next three-year period to reduce barriers and prevent the introduction of new barriers based on seven priority action areas.

- | | |
|---|---|
| 1. Employment | 5. Communication other than ICT |
| 2. Design and Delivery of Programs and Services | 6. procurement of goods, services, and facilities |
| 3. The Built Environment | 7. Transportation |
| 4. Information and communication Technologies | |

Carson Air developed this plan identifying organizational goals:

Goal 1	Promote a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees and students are empowered and supported to achieve their full potential.
Goal 2	Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.
Goal 3	Ensure that Carson Air’s employees are sufficiently trained.
Goal 4	Create a workplace free of physical barriers to improve the working environment for all Carson Air’s employees of various abilities.
Goal 5	Ensure that all employees have a safe environment to work in.
Goal 6	Ensure that all staff have access to the tools and platforms that they need to perform their work.
Goal 7	Share knowledge and best practices widely to reduce barriers across the workplace environment.

Section 3 Background

The Accessible Canada Act

The Government of Canada held consultations with persons with disabilities and the disability community and heard about what an accessible Canada means to them. This consultation informed the creation of the *Accessible Canada Act* (ACA).

Under the ACA, federally regulated entities must report regarding their policies and practices in relation to the identification and removal of barriers by publishing their accessibility plans, feedback processes and progress reports.

Each department, agency and federally regulated employer is also required to develop an accessibility plan and report on progress made against this plan annually.

Carson Air Ltd

Carson Air has approximately 140 employees dedicated to providing essential services and Flight Training. As a medevac airline, cargo and flight training provider, our facilities are not open to the public, with all passengers transported aboard company aircraft having completed pre-screening processes via outside agencies prior to transport. Therefore, our plan focuses primarily to maintain and ensure continued access to our employees and students.

Principles

Carson Air is committed to comply with the Accessible Canada Act and the Canadian Transportation Agency. While Carson Air Ltd has had an employment equity practices for many years that apply to all aspects of employment with Carson Air Ltd, including recruitment, hiring, training, transfer, promotion, job benefits, pay, dismissal, educational assistance, and social activities, we recognize the need to strengthen workplace initiatives to reach our goals.

Carson Air's aim with the accessibility plan is twofold: identify, remove, and prevent accessibility barriers and continue to address the accessibility needs based on the following principles:

- All persons must be treated with dignity regardless of their disability.
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disability.
- All persons must have barrier-free access to full and equal participation in society, regardless of their disability.
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disability.
- Laws, policies, programs, services, and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the intersecting forms of marginalization and discrimination faced by persons.

- Persons with disabilities must be involved in the development and design of laws, policies programs, services, and structures.
- The development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for person with disability.

We seek to provide alternate ways when a barrier is identified. Any alternatives identified will meet the requirements of the Canadian Air Regulations (CARs), as well as the requirements of Airside Security.

Carson Air's Accessibility Plan will be updated as new initiatives are introduced. We will continue to consult and review any developments or suggestions for improvements received collaborating as needed to remedy any future barriers identified.

The sections below set out the planned activities identified to achieve its accessibility goals over the next 3 years, including activities that Carson Air already performs to support accessibility.

Feedback Mechanisms

The Human Resources Manager is designated to receive accessibility feedback and will coordinate to meet new obligations described under the ACA as required.

Carson Air welcomes feedback from employees, students, and groups representing the interests of persons with disabilities on:

- The manner in which Carson Air is implementing its Accessibility Plan
- The barriers to accessibility encountered by Carson Air employees, students and people accessing our facilities.

Contact Information

Feedback may be provided to the Human Resources Manager (Person designated to receive feedback):

- **Accessibility Feedback form** – available in the Company intranet, website and upon request
- **E-mail address:** hr@carsonair.com
- **Telephone number:** 250 765 7776 extension 225
- **Mailing address:**
Human Resources Manager
200 – 6197 Airport Way, Kelowna BC V1V 2S2

Acknowledgement of receipt will be provided in the same manner as the feedback was received unless it is requested using a different channel or format. Feedback may be provided anonymously, in which case acknowledgement of receipt will not be issued.

Alternate Formats

Carson Air will provide any information relating to its Accessibility Plan and/or feedback process in an electronic format that is compatible with adaptive technology that assists persons with disabilities upon request. Requests for documentation in Braille or audio format must be fulfilled within 45 business days of the request. All other requests must be fulfilled within 15 business days.

Section 4 Priority Areas

Employment

Carson Air will continue to follow our Equal Opportunity Employment practices, which apply to all aspects of employment, including recruitment, hiring, training, transfer, promotion, job benefits, pay, dismissal, educational assistance, and social activities.

It is the responsibility of Carson Air senior management team to review any instances where an employment barrier is identified, by either an applicant or existing employee. The receipt, discussion, feedback, and any corrective actions taken are led by Human Resources Manager.

IDENTIFIED BARRIERS	
1	Formal training for employees regarding disability and unconscious bias

Goal 1 –Promote a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

	SUPPORTING ACTION	Lead	Target Date
1	Promote accessibility-related training to all employees.	All managers	Ongoing
2	Promote mechanisms for employees to raise concerns.	All managers	2023
3	Establish unconscious bias training for managers with delegated staffing authority.	Human Resources Team	2023
4	Scent-Free Environment directive which is shared with employees including new hires during the orientation session.	Human Resources Team	2023

Goal 2- Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

	SUPPORTING ACTION	Lead	Target Date
1	Review available workforce data to gain insight into gaps	Human Resources Team	Ongoing
2	Promote the self-identification questionnaire.	Human Resources Team	Ongoing
3	Conduct an Employment Systems Review of internal policies and practices to identify barriers.	All managers	2023- 2024
4	Ensure onboarding practices are accessible. This includes reviewing and updating the orientation program and checklist for new employees.	Human Resources Department	2023

Design and Delivery of Programs and Services

This section sets out information about how the organization identifies and removes barriers, and prevents new ones by the way it designs and delivers its programs and services.

This section includes the details about how Carson Air Ltd considers and includes accessibility when designing and delivering its programs to its employees and students. This section includes feedback received from Carson Air’s personnel on the design and delivery of the Carson Air’s programs.

IDENTIFIED BARRIERS	
	No barriers have been identified in this section.

Goal 3 – Ensure that Carson Air employees are sufficiently trained.

	SUPPORTING ACTION	Lead	Target Date
1	Ensure that training on soft skills such as unconscious bias and how to handle difficult situations is offered to build awareness and understanding of persons with disabilities and accessibility issues.	Human Resources Department – Training Department	2023
2	Encourage the use of plain language for investigation reports and other Carson Air polices.	Safety Manager / Human Resources Team	2023
3	Monitor to ensure that identified solutions have the desired effect, or whether more accessibility features can be incorporated.		2023

The Built Environment

This section contains the organization’s policies, programs, practices, and services designed to identify, remove, and prevent barriers in the built environment. The built environment refers to human-made structures, features, and facilities that can have a material impact on health and wellbeing and, if optimized, can ensure that all employees have equal and fair access to and use of internal infrastructure.

IDENTIFIED BARRIERS	
1	Administration office located in Kelowna base are on the second floor – long set of stairs to access the office without alternative access.
2	No marked areas on designated parking areas for blue badge holders.

Goal 4 – Create a workplace free of physical barriers to improve the working environment for all Carson Air employees of various abilities.

	SUPPORTING ACTION	Lead	Target Date
1	Examine our current offices in consultation with advisors who can provide tools, resources, and access to training on how effectively create a barrier free environment.	TBD	2023
2	Identify and implement workstations for persons with mobility impairment.	TBD	2023-2024

Goal 5 – Ensure that all employees have a safe environment to work in.

	SUPPORTING ACTION	Lead	Target Date
1	Document and review evacuation plans with employees with disabilities.	Safety Manager	2023-2024
2	Ensure that smoke, fire and other emergency alarms have visual as well as auditory alerts.	Safety Manager	2023-2024
3	Integrate the accessibility plan in Carson Air Occupational Health and Safety policies to ensure we can identify risk and hazards to employees with disabilities.	Safety Manager	2024-2025

Information and Communications Technology (ICT)

This section contains the policies, programs, practices, and services designed to identify, remove and prevent barriers related to ICT, which includes the accessibility of all telecommunication systems and computer systems operated or controlled by Carson Air.

IDENTIFIED BARRIERS	
	No barriers were identified in this area

Goal 6 – Ensure that all staff have access to the tools and platforms that they need to perform their work.

	SUPPORTING ACTION	Lead	Target Date
1	Acquire technology with accessibility in mind.	IT Liaison	2022-2023
2	Adapt existing systems to make them accessible.	IT Liaison	2023-2025
3	Integrate validation for accessibility into the software development life cycle	IT Liaison	2024
4	Add accessibility to the compliance assessment for new non-standard software requests, which already incorporate cybersecurity and privacy assessments, as part of the non-standard software/service request procedure.	IT Liaison	2024
5	Consult and join communities of practice through Exchange Income Corporation’s platforms to identify best practices and share lessons learned on complying with ICT accessibility requirements.	IT Liaison	2023
6	Review the accessibility of the website to ensure it meets Web Content Accessibility Guidelines.	IT Liaison	2023
7	Continually review and improve and improve the Company website content in terms of plain language and useability	IT Liaison	On going

Communications other than ICT

This section contains the policies, programs, practices, and services designed to identify, remove, and prevent barriers with respect to non-ICT aspects of communication. This section sets out information about how Carson Air addresses communicating, in language that is informed, respectful and accessible to persons with disabilities. This includes spoken, written, signed, and other forms of communication.

IDENTIFIED BARRIERS	
1	Carson Air use traditional method of communication. No alternative method to communicate.

Goal 7 – Share knowledge and best practices widely to reduce barriers across the workplace environment.

	SUPPORTING ACTION	Lead	Target Date
1	Share accessible communications knowledge with other Exchange Income Corporation subsidiaries to offer awareness sessions and policies that covers accessibility issues.	Human Resources Manager	2023-2024

The procurement of goods, services, and facilities

This section contains the policies, programs, practices, and services designed to identify, remove, and prevent barriers in its procurement of goods, services, and facilities.

Procurement refers to the act of purchasing, including the overall evaluation process leading up to the purchase. The procurement of goods, services and facilities can include purchasing equipment putting contracts or arrangements in place for the provision of services and for specifications and requirements related to newly built or renovated terminals and any related facilities.

IDENTIFIED BARRIERS	
1	Lack of training for employees responsible for the procurement of good, services and facilities.

	SUPPORTING ACTION	Lead	Target Date
1	Ensure that procurement-related activities comply with all legal and policy requirements, including the ACA.	TBD	On going
2	Develop a training framework for all individuals involved in the procurement process	TBD	On going
3	Review the accessibility of potential facilities as part of our overall determination of suitability. Items of consideration may include: <ul style="list-style-type: none"> • 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 	TBD	On going

Transportation

We have no transportation-related activities that are subject to the Accessible Canada Act or Accessible Canada Regulations.

As a medevac, cargo and flight training provider, our facilities are not open to public and medevac transportation already follows specific requirements to assist patients.

Section 5 Consultations

Methodology

This plan was developed based on a variety of information sources. We have been collecting information and consulting employees and students to identify barriers, as well as developing and implementing measures to eliminate them.

Our facilities are not open to the public; however, as part of Exchange Income Corporation we reached out to similar operators to evaluate our unique environment. The teamwork was extremely valuable as the suggestions and measures offered by similar operators provided us with relevant information to prepare Carson Air's accessibility plan. Collaboration and consultation occurred by online meetings and exchange of information.

Data exchange

- Assessing barriers faced by employees, and specific training and measures that can be taken to improve.
- Developing and integrating feedback and response mechanism into our policy regarding accessibility.
- Training to support leadership and employees.
- Importance of communication about our policy to ensure participation to meet the goals.

Training

Carson Air provides training by the internal learning platform which assigns specific modules to each employee. This system keeps records of employees completing the training assigned.

All the training that Carson Air identifies which will help to meet the Accessibility Plan goals will be included in the training platform, the employees will be required to complete it in specific period. Ongoing training will be also assigned through the platform.


Progress

Carson Air will continue to rely on these sources to monitor implementation of this plan and to measure its progress. We are committed to continue to ensure targeted consultation of persons with disabilities.

We will closely monitor all priority areas to measure progress on the activities mentioned herein and to identify any lingering or emerging barriers. We will adjust and implement new initiatives as needed and will develop indicators to help measure our success.

APPENDICIES

Appendix A. – Feedback Form



ACCESSIBILITY FEEDBACK FORM

We are developing an Accessibility Plan to address accessibility barriers in our policies, practices, and procedures. We strive to identify, remove, and prevent barriers to accessibility which will enhance standards for all our employees and students.

Carson Air is committed to improving accessibility and to reducing stigma associated with all disabilities and we are asking for your input and assistance in ensuring we meet the needs of all our employees and students as we develop our plan.

Participation is voluntary. The information you provide is collected enable our organization to collect data to comply with the Accessible Canada Act. The information collected is confidential and will be only used by or be disclosed to other personas within the organization to carry out the Company's obligations under the Act and will be retained for statistical purposes only.

1. I am a: Student Employee Visitor

2. Have you, or someone you know, experienced difficulties relating to accessibility while at any of our sites? Yes No Not sure.

3. If yes, please select all the barriers that apply:

Physical	<input type="checkbox"/>	Architctural	<input type="checkbox"/>	Communication/Information	<input type="checkbox"/>
Technological	<input type="checkbox"/>	Attitudinal	<input type="checkbox"/>	Policy/ Practice	<input type="checkbox"/>

Other

4. If you checked one or more above, please describe the situation.

5. How can we improve?

Optional Information

May we contact you about the feedback Yes No

If yes, please provide your contact information:

Name: Email:

This process is led by Human Resources Department. All feedback will be documented and assessed as part of Carson Air continuous improvement process.

**PLEASE RETURN COMPLETE FORM TO: hr@carsonair.com, fax 250 765 9248
or by mail to 200 6197 Airport Way Kelowna, BC V1V 2S2**

Accessibility Feedback Form – Version 2.0
Revision 01-2023

Date 2023-05-15