

Perimeter Aviation LP Accessibility Plan 2023-2026

General

Perimeter Aviation is an air transportation provider that ferries both Cargo and Passengers under the Airline brands of Perimeter Airlines, Bearskin Airlines and a sister company Charter Connexions. We service remote Northern communities in both Manitoba and Ontario.

The Executive stakeholder responsible for receiving and to action Accessibility feedback is:

Brad Byrne
VP, Commercial Services
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To provide feedback or request an alternate format of the accessibility plan, an alternate format of the description of the feedback process, or an alternate format of the progress report.

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Statement of Commitment

Perimeter Aviation LP believes in and strives to provide a barrier-free environment. We are committed to equal access, service, and participation for all people, regardless of their abilities. We are committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to identifying, removing, and preventing barriers to accessibility and meeting the requirements of the Accessible Transportation Planning Reporting Regulations (ATPRR) and the future Accessible Transportation Persons Disability Regulations (ATPDR) for small carriers.

We created this plan by:

- Creating an accessibility committee consisting of our passengers and employees who experience barriers, advocacy professionals and employees/ management responsible for creating policies, processes, and procedures.
- Examining our current procedures
- Conducting an inventory and assessment of all equipment used to remove barriers in passenger travel. (Wheelchairs, boarding ramps, lift chairs ect.)
- Reviewing our accessibility and disability sensitivity training

- Sending a survey to employees
- Sending a survey to the public who fly us
- Examining the barriers we know exist
- Listing known barriers
- Creating this accessibility plan to document our commitment to removing barriers
- Participating in the CTA working group of small carriers that are informing the ATPDR for small carriers

We plan to make Perimeter Aviation more accessible by doing the following:

- Collect ongoing feedback through social media, the website and our accessibility committee and our travel partners who experience barriers when travelling.
- Providing clear information about the feedback process
- Encouraging those with disabilities to work at Perimeter Aviation
- Including disability in our diversity and inclusion statements & efforts
- Providing all staff with disability awareness training
- Providing staff who work directly with passengers or employees who experience barriers to hands-on practical training.
- Considering accessibility in the procurement of goods and services.
- Considering barrier-free travel in the development of our passenger process and procedures.

Employment

Perimeter Aviation is committed to promoting diversity and inclusion by recruiting and developing individuals in all four designated groups under employment equity, including persons with disabilities. In the next five years, Perimeter will make a solid effect in recruiting and hiring more individuals with disabilities throughout multiple workgroups and locations in our organization. We will review our current hiring practices and associated tools to ensure that the recruiting and onboarding processes are fair and reduce barriers for those seeking employment with disabilities. We will also continue our work with external agencies that support this effort and assist in employing those that experience occupational barriers due to disability.

We understand that our employees need access to the right tools and resources to meet their needs and the organization's goals. We are committed to reviewing and improving our accommodations services. Our organization will continue to support employees who require accommodation and commit to doing what we can to make this process faster and clearer. This will be achieved through reviewing our current process, educating Leaders on their duty to accommodate, and creating an environment where employees feel comfortable and able to share their needs openly and safely while

understanding the Company's desire to support all staff and their success. We will ensure that annual budgets have money allocated for alternate equipment or other resources related to workplace accommodation so as not to have barriers in supporting staff's needs.

Finally, we will update our internal web content to include information on accessibility and support for individuals with disabilities. Our commitment to diversity and inclusion will help us ensure that persons of all abilities feel supported and welcomed at Perimeter Aviation.

Information and communication technologies (ICT)

Modern society relies on sharing and communicating information digitally. We want to ensure that all can access and use our information and communications technology products, services and digital content. Perimeter Aviation will work to ensure accessibility is a consideration from the start of every project.

We know it is essential that everyone, including people with disabilities, can access what they need through our websites, communications, software and hardware.

The following information and communication technologies are leveraged to remove barriers:

- Website (Working towards full Level AA Web Content Accessibility Guidelines [WCAG] Q1 2024)
- Dedicated email address for accessibility concerns/feedback barrierfree@perimeter.ca

Future State:

Dedicated accessibility webpage (Level AA WCAG compliant) indicating the following:

- All services offered by Perimeter are listed in clear language and pictogram format
- This Accessibility Plan
- All forms required, including APPR-related information in accessible formats
- Clear description of the accessible feedback process, including contact information

Persons with hearing or speech impairments may experience communication barriers when accessing our services. To mitigate this concern, we offer the following services:

- Public Telephones are TTY compliant
- Bell Relay Service (711)
- We accept Jobs applications and submissions through the website and paper forms are available by request.

Future state:

- Visual Cue Cards such as pictograms to indicate passenger travel needs. (2024)
- Visual Paging at Check-in and Boarding (2024)

Communication, other than ICT

When requested, we are dedicated to promptly offering alternative formats within the timelines specified in the Accessible Canada Regulations and the Air Transportation Planning Reporting Regulations (ATPRR), which include:

- Print (within 15 days)
- Large print (within 15 days)
- Braille (within 45 days)
- Audio format (within 45 days)
- Electronic format compatible with assistive technology designed to aid individuals with disabilities. (within 15 days)

Alternative formats of this Accessibility Plan can be requested at barrierfree@perimeter.ca

We offer alternative communication during check-in, boarding and onboard the aircraft and during safety-critical interactions such as:

- Written instructions by paper or mobile texting if requested
- Physical direction assistance, offering guidance by touch and verbally describing the built environment the passenger is maneuvering through.

Manitoba Possible communication training for interacting with those who experience disability and barriers planned for 2024.

Procurement of goods, services and facilities

To meet our accessibility goals, understanding and consideration must be practiced during the procurement process.

To ensure that accessible procurement practices are implemented, we will take the following steps:

- Solicit employee feedback on the internal challenges faced in access to equipment and services that remove barriers.
- Create a procurement policy that provides a checklist of accessibility criteria for purchasing goods and services.
- Develop a training framework for all individuals involved in the procurement process. By consulting with our Accessibility Committee and advocacy groups, we will provide enhanced training in barrier awareness for those working in purchasing & supply chain. (2024)
- When further understanding of the barrier impacts of purchasing goods or services, the Accessibility Committee will be asked to consult. (2024)

Design and delivery of programs and services

We are dedicated to evaluating and creating programs and services to eradicate barriers for those who experience them anywhere in our network.

To achieve this, we have:

- Created an Accessibility Committee consisting of advocacy groups, employees and community members who experience barriers also department heads who can effect change.
- Consulted individuals with disabilities while developing or reviewing programs and services. We have sent out a public survey through social media to receive current feedback and will send out surveys twice a year ongoing.

Our ultimate objective is to design and deliver programs and services in a manner that is accessible to everyone, particularly those with disabilities. We are dedicated to ensuring that all individuals who engage with us are satisfied with the accessibility of our programs and services.

To achieve this, we will:

- Create and implement standardized forms in accessible formats to ensure that all official information is as accessible as possible. (2024)
- Creating individual journey plans with various departments known as Perimeter Accessibility Service. (2024)
- Review HR policies to ensure support of anti-discrimination, tolerance and accommodation support. (Ongoing)

We understand that training for all staff in accessibility, disability awareness and practical hands-on training with assistive equipment that is used to overcome barriers is essential to our mandate. We are currently compliant with the current regulations of Personnel Training for the Assistance of Persons with Disabilities Regulations (PTR). We have created a future state training plan to better address disability awareness, moving towards a barrier-free environment.

Current mandatory relevant training for employees and contractors:

CTA created training called “Accessibility for All” which consists of 6 online video modules and covers the following topics:

- Introduction & Sensitivities
- Services to be offered
- Communication best practices
- Assisting a traveller who is blind or partially sighted
- Assisting a traveller who is deaf, deafened or hard of hearing (or another disability)
- Mobility assistance

We also offer the following:

- Proper body mechanics training for safe lifting and movement for all front-line employees.
- Ground service employees who assist in lifting passengers also have on-the-job, hands-on training in safe lift practices.

- Flight attendants who assist passengers onboard have specific hands-on training in addressing disabled passengers' needs onboard an aircraft.

Our Standard operating procedures clearly outline that only fully trained employees can provide safety-sensitive hands-on assistance to disabled passengers.

Our Training is provided, documented, and tracked in our learning management system.

Our future state of relevant training will include all above but also include:

- Hands-on, accessible equipment familiarity (parts, light maintenance, and suggested usage) for all passenger-facing employees/contractors. (2024)
- Hands-on wheelchair handling for all passenger-facing employees.

Transportation

Our aircraft and facilities may pose physical barriers to passengers with mobility impairments. We will try to provide accessible facilities and equipment, including wheelchair-accessible ramps, lifts, and lavatories. Additionally, we will ensure that all aircraft and facilities comply with applicable accessibility codes and regulations.

Below are the known barrier challenges our passengers face and how we are addressing their elimination.

Quality and variety of signage:

- Provide visual paging in the WPG Terminal (2024)
- Work with our Terminal operating partners in the north to have visual paging in all stations (ongoing through 2026)
- High contrast text on graphic signage & braille signage in WPG Terminal and network-wide (2024)

Website access:

- Engage a web accessibility consultant to help test, remediate, and maintain our website in line with the Web Content Accessibility Guidelines (WCAG).2.0 AA conformance. (2024)

Aircraft Boarding and Assistive Equipment:

- Purchase more passenger boarding ramps to allow for dignified passenger boarding. (Four will be in operation in July 2023 & ongoing through 2026)
- Complete review and inventory of existing assistive equipment (Wheelchairs, lift devices, slide devices completed March 2024)
- Create a preventive maintenance plan for all assistive equipment used with passengers (2024)
- Replace aged assistive equipment until all assistive equipment is in perfect working condition (Ongoing through 2026)
- Improve training for staff who assist with boarding disabled passengers. As outlined in the section listed in this plan as "Design and delivery of programs and services" (2024)

Terminal Services:

- Conduct accessibility review of Terminals our aircraft fly to ensure they are aligned with our barrier-free goals. (2024)
- Prioritizing ice and snow removal from outside walkways.
- All interior doors to be of the correct width to allow people who use wheelchairs to pass through easily. (2024 and ongoing through 2026)
- All interior public-facing doors have automated door access. (2024 through 2026)
- In Winnipeg, the new terminal design built at 626 Ferry Rd will be barrier-free and vetted by advocacy partners and built or go beyond to City of Winnipeg accessibility by-laws (New Terminal finished 2025)

Built environment

Perimeter Aviation operates Aircraft to 32 different destinations using two types of aircraft. Our passengers pass through large passenger terminals and small remote stations. In all but one of our Terminals, we are a tenant and work with our landlord partners to create barrier-free travel. We are committed to identifying and addressing barriers that may prevent passengers with disabilities from accessing the airline's facilities and services.

Here are the services we currently offer to assist with a barrier-free built environment:

- Accessible parking spots in parking lots
- Accessible seating is indicated and available in Terminals where we fly.
- Visual paging in the largest Terminal WPG. (2024)
- Service Animals policy and procedures
- Accessible seating on all aircraft (Dash 8 armrests raise/ Metros have no armrests)
- Terminals have accessible access (street-level access to elevator access)
- Passenger club car is available to drive passengers to the aircraft in our largest station WPG
- Passenger Boarding Ramps in Winnipeg and Thompson.
- Passengers travelling for medical appointments and their escorts have their own fare class.
- Elders and medical patients lounge in the new WPG Terminal, allowing for more comfortable seating and addressing needs such as medical treatment privacy (EX: dialysis).

Future state:

- Visual paging in all Terminals where we fly (2025)
- Passenger boarding ramps in all stations we travel to (Ongoing through to 2026)
- Accessibility Committee researching innovations that support barrier-free experience in-flight. (Ongoing through 2026)
- All interior and exterior doors assessed for width, automation and with correct slope access (Ongoing through 2026)
- Bathroom barriers to be assessed in both public and employee spaces (2024)

- Passenger seating in the Terminal to be more inclusive, with openings for passengers using wheelchairs. (2024 addressed in new Terminal build)
- Weight Scale heights to be adjusted for those who may be seated. (2024)
- Passenger lanyards to assist staff in identifying those with hidden disabilities to ensure passenger needs and services are appropriately offered to our passengers. (2024)

Provisions of CTA accessibility-related regulations

By having a plan that respects the provisions of the CTA accessibility-related regulations, Perimeter Aviation can ensure that they provide accessible transportation services to all individuals, including those with disabilities. This can lead to a more inclusive and equitable Airline where everyone has equal access to travel.

- Part VII of the Air Transportation Regulations (ATR)
- Personnel Training for the Assistance of Persons with Disabilities Regulations (PTR)

Perimeter Aviation LP is currently taking part in the Canadian Transportation Agency small Airlines working group developing the Accessible Transportation Persons Disability Regulations (ATDPR). We follow Part VII of the ATR and enforce this through our policies and Accessibility plan.

Feedback information

Establishing a Perimeter Aviation Accessibility Committee is an important step toward promoting inclusivity and ensuring that the needs of people with disabilities are being considered. The committee is comprised of persons with disabilities and employees with firsthand experience of barriers. By bringing together diverse individuals, the committee can provide valuable insights into the most effective ways to address accessibility issues. Regular meetings will be held to review projects and plans and to provide guidance on accessibility efforts. Moving forward, the committee should be involved in project planning, providing feedback, and offering advice on accessibility to ensure that all voices are heard and that accessibility solutions work for everyone.

We also solicit feedback through the following:

- Dedicated email found on the website barrierfree@perimeter.ca
- Curated Customer feedback surveys sent twice a year through social media
- Live feedback links on our website

Perimeter Aviation Will acknowledge receipt of feedback, other than anonymous feedback, in the same method it was received.

Consultations

This Accessibility Plan was created by consulting with our Perimeter Aviation Accessibility Committee which consists of the following members:

- Members of Advocacy groups (Manitoba Possible and Jacob's Principle)
- An Elder Passenger who experiences barriers and lives in one of the communities we serve.

- Employees who experience barriers
- Nursing professional
- Corporate Trainer
- Director, Marketing & Communications
- VP of Safety
- VP of Human Resources
- VP of Commercial Services

We also sought feedback from our passengers by sending out a survey regarding barriers they face when travelling our network. We used this feedback to validate some of our known barriers and add to the list of remediations required.

Reporting and Review

Perimeter Aviation will review and report on progress toward achieving the objectives outlined in this Accessibility Plan. The progress report will be submitted to the Canadian Transportation Agency (CTA) as the ATPRR requires. The review will take place annually, and any necessary updates to the plan will be made accordingly.

Conclusion

Perimeter Aviation is committed to improving accessibility for individuals with disabilities and ensuring equal access to our services. We will continue to identify and remove barriers to accessibility and ensure that our services are accessible to all.