

# Accessibility Plan

Montair Aviation Inc.

Head Office 160 – 18799 Airport Way Pitt Meadows, BC V3Y 2B4



# Montair Aviation Accessibility Plan

#### **Executive Summary**

As part of our commitment to improving accessibility by removing barriers for persons with disabilities, we have prepared this Accessibility Plan. We will produce progress reports every year and update this plan every 3 years as required by the <u>Accessible Canada Act</u>. We have also set up a feedback process to receive, respond and react to feedback on our plan and accessibility barriers.

To prepare this plan we consulted with stakeholders through online surveys and discussion groups to identify current barriers to accessibility. We then analyzed priority areas and prepared action items for the coming years to work towards reducing and removing the barriers to accessibility.

It was evident from the consultation process that we have many areas that could be improved within our organization. Although we are aiming to work on reducing these barriers, change takes time. We are committed to the long-term goal of the Accessible Canada Act of ensuring a barrier-free Canada by 2040.

The areas described as being most important to focus on were information and communication technologies, the built environment and our programs and services. Therefore, our action plans were developed to focus on these areas. Details of our planned actions are shown in the sections below.

It was also identified that providing employee training on accessibility, recognising barriers, and the intent of the Accessible Canada Act should be an important part of our future planning.

We are confident that the on-going completion of our identified action items will make Montair a more diverse, inclusive and barrier-free environment to enable equal opportunities for all.



# Glossary

# Accessibility

Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services, equipment and facilities are purchased, used or modified so that they can be equally enjoyed by all.

# Accessibility Coordinator

A designated employee of Montair that is responsible for receiving, organizing, recording and distributing information and feedback related to accessibility at the company. They will facilitate and track action items in the Accessibility Plan.

# Accessibility Plan

Refers to this plan, developed by Montair, to meet our obligations of the Accessible Canada Act.

# Accommodation

This is a modification to rules, policies, practices, or tasks to ensure that a person can fully participate in the workplace, without discrimination.

# Assistive or adaptive device/technology

A device, system or equipment designed to help a person do a task. Examples include canes, crutches, walkers, wheelchairs, hearing aids and personal emergency response systems. They can also be IT-related items such as screen-reading software.

# Barrier

Anything physical, technological or related to building design, environment, attitude, policy or practice that does or could prevent the full and equal participation of persons with a disability.

#### 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.



# **Inclusio** n

The act of including someone or something as part of a group. An inclusive workplace is fair, equitable, supportive, welcoming and respectful. Inclusion values and leverages differences in identities, abilities, backgrounds, cultures, skills, experiences and perspectives.

# Abbreviations

ACA	Accessible Canada Act
ACR	Accessible Canada Regulations
ICT	Information and Communication Technologies
тс	Transport Canada
VRS	Video Relay Service
WCAG	Web Content Accessibility Guidelines



# General

The <u>Accessible Canada Act</u> (ACA) is a federal law that was created to find, eliminate and prevent barriers that people with disabilities face daily. The Act's primary goal is to create a Canada that is free of barriers by 2040. To achieve this, the Act requires that federally regulated private employers prepare and publish an Accessibility Plan.

Montair Aviation is committed to improving accessibility to all areas of our operation, including our workplace, programs, policies and communications. We have prepared this Accessibility Plan to meet our obligations under the <u>Accessible Canada Act</u> and the <u>Accessible Canada Regulations</u> (ACR).

We are committed to ensuring equal access and participation for people with disabilities whenever possible, by meeting the needs of people who face accessibility barriers. We will treat people with disabilities in ways that allow them to maintain their dignity and independence. We believe in inclusion.

As part of this on-going process, we have identified barriers and set out action plans on how to remove and prevent them. This Accessibility Plan explains what we have found as potential barriers and the steps we will be taking to improve our organizations' accessibility.

If you need more information or assistance on anything related to accessibility at Montair, including obtaining information in alternate formats, please contact our **Accessibility Coordinator**. Contact information is provided in the "Feedback" and "Contact Us" sections of this plan.

#### Our Company

Montair Aviation is a flight training school, operating from the Pitt Meadows Airport, in British Columbia. Our primary clients are students looking to obtain instruction and training in both aviation ground theory and pilot training courses to obtain Transport Canada regulated qualifications, proficiencies, licences, permits and ratings in aeroplanes.

We have approximately 25 employees.



# Principles of the Accessible Canada Act

The Accessible Canada Act contains 7 principles that have been used as the foundation while preparing this plan:

- 1) everyone must be treated with dignity
- 2) everyone must have the same opportunity to make for themselves the life they are able and wish to have
- 3) everyone must be able to participate fully and equally in society
- 4) everyone must have meaningful options and be free to make their own choices, with support if they desire
- 5) laws, policies, programs, services, and structures must consider the ways that different kinds of barriers and discrimination intersect
- 6) persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures
- 7) accessibility standards and regulations must be made with the goal of achieving the highest level of accessibility

#### Our Commitment to Accessibility

We are committed to work with our employees, students and other stakeholders to improve accessibility at Montair by:

- Improving our facilities, programs, services, communication, employment and operational practices by removing barriers
- Treating everyone with respect
- Encouraging diversity



As required by the Accessible Canada Act, we will publish a progress report every year that shows how we have moved forward on our commitments in the Accessibility Plan. We will update our Accessibility Plan every 3 years.

<u>Feedback</u>

Please send your feedback to our Accessibility Coordinator.

You can send any feedback by email, phone, mail or online using the contact information listed below. This feedback could be anything that you think would be useful to improving accessibility (removing barriers) at Montair. For more information on how we deal with feedback, please see our feedback process description. This is available through the link on our website <u>www.montair.com</u>

You can use the contact information listed below to ask us for a copy of our accessibility plan and our feedback process description in **alternate formats**. You can request these in print, large print, Braille, audio or an electronic format that is compatible with adaptive technology.

We will provide the format you ask for as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 20 days.



# <u>Contact Us</u>

If you need more information or assistance on anything related to accessibility at Montair, including a request for alternate formats of documents, please contact our **Accessibility Coordinator**.

Email:	accessibility@montairaviation.com
Phone:	+1 (604)-465-8825 or +1 (866) 975-6668
	(press "0" for Dispatch)
Mail:	#160-18799 Airport Way,
	Pitt Meadows, BC V3Y 2B4
Online Feedback Form:	https://formurl.com/to/acc-feedback
Social media:	Please post your request or comment and this will be passed on to the Accessibility Coordinator who will respond.



# Consultations

Montair completed a consultation process in January 2025 to help gather information on barriers to accessibility in our organization. This information was used to help develop this Accessibility Plan and our feedback process, which had not been started before the consultations were complete.

#### 1. Process

We consulted using these methods:

- a. Online survey for employees, clients and other stakeholders
- b. Management survey
- c. Discussion groups with management and an external consultant. These were used to identify any other barriers within our organization, that may not have been captured elsewhere. They were also used to identify potential action items for this Accessibility Plan.

We made our consultation accessible by identifying in the survey that alternate formats were available, if requested, or by phone and in-person if preferred.

The online survey was open to employees and students from December 30, 2024 – January 20, 2025, and invitations to participate and reminders were sent by email.

- 2. Online Survey Participants
  - A total of 11 responses were received: 82% from employees, 18% students, 0% others.
  - 36% of respondents identified as having a direct connection with or knowledge of a person(s) with a disability or direct knowledge of accessibility challenges for such persons.



- No respondents identified as having a disability.
- 3. Online Survey Questions

See Appendix A for the list of questions that were included in the online survey.

- 4. Summary of Responses to Online Survey
- No respondents felt that they have ever been unable to participate in an activity at Montair due to a barrier.
- The respondents **highest** ranked areas for Montair to focus on when planning accessibility improvements were:

Important, Very Important or Extremely Important:

Information and Communication Technologies	91%
Built Environment	82%
Programs and Services	73%

- The area that appears to be a lower priority for Montair to focus on when planning future improvements was Procurement Practices.
- Other areas had intermediate rankings of importance, including, fully accessible equipment, tools and services, communication and employment practices.
- Participants were asked about barriers they may have identified or experienced in the following areas **not related to program delivery**. Representative comments are shown.
  - a. Physical (36% of respondents identified this area as having barriers)



- Staircase only access to 2<sup>nd</sup> floor
- No automatic door openers
- > Have a classroom downstairs
- > Move all classrooms and study areas to downstairs
- b. Vision (0% of respondents identified this area as having barriers)
- c. Hearing (9% of respondents identified this area as having barriers)
  - > Dispatch area can be loud when busy
- d. Sensory (18% of respondents identified this area as having barriers)
  - Loud dispatch area
  - Aircraft are loud
- e. Cognitive (9% of respondents identified this area as having barriers)
  - > Language barriers are sometimes present
- f. Overall Environment (27% of respondents identified this area as having barriers)
  - > Not enough seating in reception
  - Not enough briefing rooms, therefore teaching was being done in other areas that could have barriers
  - Busy and loud dispatch area
- g. Mental Health (0% of respondents identified this area as having barriers)



- Summary of other relevant comments received identifying areas for improvement:
  - > More effective dispatching processes needed
  - > Improved communication technologies at dispatch needed
  - > More staff training would be helpful
  - > Could make hiring processes more inclusive
- The least identified area for improvement was *Procurement* (identified by 0% of respondents)
- 5. Management Survey and Discussion Groups: Process and Participants

Members of the Montair management team were asked to participate in the development of our Accessibility Plan. This was done by:

- Providing feedback on components of the plan as it was developed
- Reviewing a list of barriers identified by the external consultant and from online survey participants and providing feedback on them.
- Assessing the awareness level of management of key aspects of the Accessible Canada Act, Accessible Canada Regulations, related Transport Canada regulations and potential barriers within the organisation. This was achieved through questionnaires and discussion meetings.
- 6. Management Survey Questions

The survey questions shown in Appendix B were sent to the Montair management team.

All responses were either "Yes", "No", or "I am not aware or do not have any knowledge of this subject". Follow-up information was requested as needed.

Accessibility Plan



7. Summary of Responses to Management Survey

A total of 3 responses were received. A summary of the responses is shown below:

- Training is not being provided to employees to improve knowledge and awareness of accessibility needs.
- There is no knowledge at the present time on how to make documents and communication accessible.
- All areas of Section 5 of the ACA are identified as having barriers to accessibility.

8. How we Used the Information

The information gathered from all sources – management, external consultant and surveys was collated. From this the barriers to accessibility were identified and grouped together into 7 areas:

- The built environment
- Programs and services
- Communication
- Information and communication technologies
- Employment
- Procurement
- Transportation

For each of these, action plans have been developed that consist of both short-term and longer-term goals. These action plans were reviewed and approved by the management team. The results are shown in the following section and have been used to guide the development of this Accessibility Plan.



9. Identified Areas for Improvement in the Consultation Process

After the consultation process was complete, a review of the process was conducted. This identified several areas that could be improved during the next reporting cycle.

- a. Contact external accessibility and disability experts. They could be asked to review our Accessibility Plan and feedback process to identify areas for improvement.
- b. Ensure that the consultation process captures input directly from persons with disabilities.
- c. Ensure there is a process for the public to provide input during the consultation process.

It was also noted that some responses received from the online survey were not directly related to accessibility. Although these were taken into consideration for general planning purposes, they were not included in the development of the Accessibility Plan. This could be the result of participants not understanding some of the terms used in the survey or the aim of gathering the information. This could be improved in the future by better education and training.

Some areas were identified as requiring action items that at this time were either prohibitively expensive or not achievable given the size of our company and the resources available. The information is still important to us, and so these items were grouped together for review during the development of the next Accessibility Plan in 3 years.

It is important to note that as Montair is also regulated by Transport Canada, there are some areas that the company has limited control over. For example, there are strict limitations on the medical requirements for a



student to be able to obtain a Transport Canada medical certificate. This is required to be able to complete flight training.

In addition, aviation is a technical and complex industry. There are some subjects, terms, descriptions, documents and methods that would be extremely difficult to put into simple (non-technical) language.



# Company Analysis of Barriers to Accessibility and Action Items

The following is a summary of the review conducted in each area of Section 5 of the <u>Accessible Canada Act</u>, including action items for the company to complete. Tracking of events and outcomes will be measured by the company's Accessibility Coordinator.

All long-term action items will be reviewed and modified as needed, when each annual progress report is completed.

# **1.** The Built Environment

Identifying and addressing barriers in the built environment helps us to ensure that workspaces and the work environment are barrier free and accessible for all.

#### <u>Goal</u>

To offer the highest level of accommodation possible, based on resources available, to our employees, clients and visitors with disabilities, allowing them access to our facility and services

#### Areas Reviewed and Findings

#### Entrances and Exits

- Lack of automated door opener at main entrance.
- Step from hangar to outside (door by dispatch) not wheelchair accessible.
- Some doorways may not meet recommended width requirements for wheelchair access.



# Other Building Design Features and Access

- No second-floor access apart from stairs. Stairs do not have high luminance contrast strips installed.
- Dispatch and reception areas could have improved design to decrease overcrowding and noise.
- Counters may be too high for persons in wheelchairs and do not meet recommended standards.
- Training areas (briefing rooms) are only on the second floor. Primary classroom is only on the second floor.
- Outside access from dispatch has step with no ramp. Access area has uneven surface, and width does not meet requirements.
- Areas with poor luminance contrast between walls and floor.
- Other areas need further assessment e.g. door hardware, entrance clear floor area, lighting.
- No tactile walking surface indicators to warn of hazards e.g. top of stairways.

#### Washrooms

 There is one accessible washroom on main floor, north side, that has handrails and lowered fixtures, but it may not meet all the recommendations of CAN-ASC-2.3 - Draft Version: Model Standard for the Built Environment – Accessibility for Federally Regulated Entities as Defined in the Accessible Canada Act.

https://accessible.canada.ca/centre-of-expertise/builtenvironment/can-asc-23-standard-built-environment

https://accessible.canada.ca/sites/default/files/2024-05/modelstandardforthebuiltenvironment-en.pdf

- Upstairs washrooms are not accessible.
- No signage to indicate the location of, or directions to accessible washrooms.



# Signage

- Signage does not meet requirements. No signage in alternate formats.
- Poor lighting for some signage.
- No information on the company's accommodation processes is available.

# *Emergency Equipment and Response Plans*

- Fire alarm does not have visual warnings (flashing lights).
- No signage in alternate formats for fire escape routes.
- Emergency response plans do reference assistance to persons with disabilities, but no details are provided on how this should be done.
- Emergency response plans are not available in alternate formats.
- Harassment and Violence Prevention Policy does not reference procedures or accommodations for persons with disabilities.

#### Planning

• Accessibility and barrier prevention or removal has not been part of company planning for previous building modifications or renovations.

#### Short Term Action Items

- 1. Examine the requirements for accessible washrooms to evaluate if at least one of the lower floor washrooms could be modified to meet the required standard. Complete assessment within the next 12 months.
- 2. Post a sign at the main entrance door "If you are unable to open this door or require any other assistance to access the building, please ring the doorbell and somebody will come to assist you". Complete within 3 months.
- 3. Determine the feasibility and cost of installing an automatic door opener at the main entrance door and report to the Accessibility Coordinator within 6 months.

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- 4. Establish an accessibility committee within the next 6 months, that will meet after each Health and Safety Committee meeting. The accessibility committee will research the feasibility of facility design changes and universal design principles. Subject matter experts will be invited to attend as required.
- 5. Review the use of second floor spaces by students, within 6 months. If it is identified that a student cannot access this area and needs to do so in order to complete their training, then procedures and policies will be developed to accommodate this as part of longer-term action items.
- 6. Review the design and usage of the dispatch and reception area to identify ways that crowding and noise can be decreased, within the next 12 months.
- 7. Investigate options for alarm system updates that include both auditory and visual warnings within the next 12 months and report to the accessibility committee for inclusion into long term planning.
- 8. Research training to relevant employees on the requirements and principles of the Accessible Canada Act in relation to the built environment and how to identify barriers and accommodate, within the next 6 months. Create and/or provide initial training as required.

# Long Term Action Items (12-36 months)

- Accessibility Committee to develop a method for employees to report identified barriers and understand the basic concepts of accommodation processes, through training. Complete within the next 18 months.
- 2. Evaluate all building signage for opportunities for improvement for persons with disabilities within 24 months.
- 3. Research a viable solution to allow second floor access to all or provide a long-term solution to ensure that no student or employee is disadvantaged by not having this access within 36 months.



- 4. Evaluate the options to upgrade interior and exterior doorways and entrance/egress paths to meet accessibility standards and report to the Accessibility Coordinator within 36 months.
- 5. Update all emergency response plans to include standardized information on assisting persons with disabilities, as referenced in the existing Fire Safety Plan. Complete within 18 months.
- 6. Research and develop a plan for long term and recurrent training for all employees, within 18 months.

# Long-Term Action Items (greater than 36 months)

1. Execute a viable solution to allow second floor access to all, if deemed required and feasible, based on previous research completed.

# 2. Communication (other than Information and Communication Technologies)

Montair Aviation communicates with our stakeholders, students, employees, contractors and the public. This includes general information, employment, marketing, media, memos, presentations, meetings and publication of policies and procedures.

By addressing communication-related barriers, we will improve the accessibility of the documents we create and the communications we have with our staff, clients and the public.

<u>Goal</u>

All employees and students to have the equal ability to access and understand information, knowledge and training.



# Areas Reviewed and Findings

*Company Policies, Procedures and Use of Accessibility Checklists* 

- The company does not have a process or policy to ensure alternate formats of communications are available.
- No training is being provided on the use of clear language or improved and alternate methods of providing materials.

#### Company Written Materials

- Inconsistent font styles and sizes. Use of serif fonts and small text.
- Many forms and documents written in complex language that may be hard for customers to understand (although sometimes this is required due to the technical field within which the company operates).

# Training Materials

• No significant employee knowledge of alternate training materials and methods that could be used.

#### Short Term Action Items

- 1. Research options for providing staff training on accessibility and barrier awareness, within the next 12 months.
- 2. Research potential service providers that can create alternate formats of documents as and when needed. These shall include print, large print, braille, audio format and electronic format that's compatible with adaptive technologies. Report findings to the Accessibility Coordinator within 6 months.
- 3. Develop a standard introductory paragraph for all company documents that informs the reader that it is available in alternate formats and how to get them, within 12 months.



4. Management to appoint an Accessibility Coordinator within 3 months of the publication of the Accessibility Plan. They will be responsible for developing a process for responding to requests for accessible supports and services and communicate/coordinate training for employees, as identified in this Plan. They shall also track progress on action items and report to the Accountable Executive. **COMPLETED** 

# Long Term Action Items (12-36 months)

- Provide staff training on accessibility awareness and reducing communication barriers such as avoiding verbal only communication, increased use of published, accessible meeting minutes, use of alternate formats and how to consider the nature of a person's disability when communicating. Complete training for 80% of employees within 24 months.
- 2. Review the most referenced company documents to identify general areas of improvement with respect to readability, within the next 18 months.
- 3. Develop accessibility guidelines for creating documents and train staff on their use, within 18 months.
- 4. Ask for feedback on Montair's Plan from persons with disabilities by within next 24 months.

#### Long-Term Action Items (greater than 36 months)

1. Continued review of the accessibility of communications when developing new forms, processes, procedures and manuals or when updating current documentation with a goal to have all updated wherever possible.



# 3. Information and Communication Technologies (ICT)

Information and communication technologies are used to deliver, store, create, share or exchange information, perform activities and provide services. This can include hardware, software, video or voice communication and other digital content including documents, websites, intranets and social media.

By addressing information and communication technology-related barriers, we can achieve a higher standard for digital accessibility. We will apply a continuous improvement approach that endeavors to keep pace with technology advancements

#### <u>Goal</u>

Employees and students can use ICT to complete tasks and get information effectively and have equal access to engagement with all material and systems.

#### Areas Reviewed and Findings

#### Company Website and Social Media

- Non-compliant with Web Content Accessibility Guidelines (WCAG) version 2.2.
- Does not include images or acknowledgements of persons with disabilities or contain references to accommodations available to program applicants.
- Does not reference that online documents are available in alternate formats.
- Videos have no subtitles, audio descriptions or transcripts
- Information on the site contains some confusing, non-plain, technical language.
- Font size in some sections is small.



# Software and Applications

- Primary operations/scheduling software (Flight Schedule Pro) does not have in-built accessibility features.
- Primary training and reference software (Aerostudies) does not have in-built accessibility features.

# Hardware

- Meeting and briefing rooms are not equipped with assistive listening devices.
- No availability, awareness or training for assistive devices and systems for other technologies e.g. phone system, email.

# Training and Knowledge

• A lack of knowledge or experience on the barriers faced by persons with disabilities with respect to availability and use of assistive accessibility technologies.

# Short Term Action Items

- 1. Publish the company's Accessibility Plan on the website within 30 days of release.
- 2. Take an inventory of all IT systems used by the company to assess accessibility capabilities within 6 months.
- 3. Assess the accessibility capabilities of company IT systems within the next 12 months.
- 4. Research options available for training on WCAG requirements, within the next 12 months.
- 5. Staff involved with ICT procurement, rollout, training and usage to complete accessibility awareness training within 12 months and to use this awareness and knowledge to progressively introduce new accessibility functionality to IT systems.



- 6. Add accessibility statements, including references on where and how to request accommodations, to the company website, within 3 months.
- 7. Review features available for improving accessibility on social media applications used by the company, within 12 months.

# Long Term Action Items (12-36 months)

- 1. Staff involved with online content to complete education and training on WCAG requirements within 18 months.
- 2. Complete an audit review of the company website against WCAG 2.2 and draft a plan of potential improvements, within 24 months.
- Develop an audit program to monitor the accessibility of all company information communication technology software and hardware within 24 months.
- 4. Develop a policy for improving accessibility of social media posts, as assessed by prior research, within 24 months.
- 5. Contact major site and software content providers and vendors to explore ways of improving accessibility features and develop a long-term plan within 24 months.
- 6. Complete a feasibility study of the installation of assistive devices and other technologies for briefing, teaching and meeting spaces, to decrease accessibility barriers, within 24 months.
- Develop accessibility guidance checklists and documents for employees that are building or procuring information technology, within 18 months.
- Ensure the availability of end-user training on the availability and use of accessibility features on company software and equipment, within 36 months.
- 9. Develop and publish ICT training materials for persons with disabilities e.g. making items larger on a screen, activating reader on MS Word,



activating closed captioning on video meeting applications available etc., within 24 months.

# 4. Employment

Resolving employment-related barriers helps to ensure everyone has the same employment opportunities at Montair. We are committed to a safe and supportive workplace and promoting a culture that values diversity, equity, inclusion and belonging.

#### <u>Goal</u>

To improve recruitment, retention, training, job satisfaction and support of employees with disabilities.

#### Areas Reviewed and Findings

#### Job Postings

- These do not reference a commitment to accessibility and inclusion or explain how to ask for disability related accommodations.
- Language used is not aligned with accessibility guidelines.

#### Training and Culture

- Training materials and methods are not available in accessible formats.
- Handwritten forms are still required for on-boarding.
- There is no perceptible cultural awareness of ensuring opportunities and equal opportunities for persons with disabilities.
- No requirement for all managers and human resources staff to take training on accessibility on how they can ensure barrier-free hiring, selection, promotion and accommodation processes.



• No return-to-work accommodation policies for employees who have been absent due to a disability.

#### Short Term Action Items

- 1. Add a statement on accessibility to all job posting and job descriptions. Provide the contact information for the company's Accessibility Coordinator on all job postings. Complete within 6 months.
- Complete research on training available for those involved with hiring and career advancement opportunities on how to support improved candidate experiences, accessibility, accommodation requirements, onboarding training options and providing equal opportunities for advancement, within 12 months.
- 3. Improve information on the company website to increase visibility to Canadians with disabilities, highlighting the company's commitment to their inclusion in the workforce, within 12 months.

#### Long Term Action Items (12-36 months)

- 1. Review all job descriptions to remove systemic biases. We will include examples of accommodations in our hiring process, such as giving someone extra time for a written exam or providing it in an alternate format. Ensure that these items are part of a standardized advertising and hiring process within 18 months.
- 2. Provide training for those employees involved with hiring and career advancement opportunities on how to support improved candidate experiences, accessibility, accommodation requirements, on-boarding training options and providing equal opportunities for advancement. Complete within 18 months.
- 3. Accessibility committee to regularly assess new workplace changes to facilities, equipment, processes and policies to ensure there are no unintended consequences that will create new barriers. Complete this at least annually, beginning within the next 24 months.
- 4. Develop information material that helps managers understand their responsibilities in the accommodation process and guides them in



supporting their employees and implementing suitable workplace adjustments, within 18 months.

5. Develop a process for producing documented individual accommodation plans and return to work plans for employees who have been absent due to disability. Complete within 36 months.

# 5. The Design and Delivery of Programs and Services

By addressing the design and delivery of both internal and external programs and services, we aim to ensure persons with disabilities have meaningful options.

#### <u>Goal</u>

To ensure accessibility and barrier removal is a core consideration and component of the planning, development, advertising and delivery of all current and future programs and services. To offer the highest level of accommodation possible and allowable within Transport Canada regulations. We aim to increase awareness of the opportunities available to persons with disabilities to complete training programs with us.

#### Areas Reviewed and Findings

#### Admissions Processes

• Admissions documents not available in alternate formats. Text is small and hard to read and not in consistent sans serif fonts. No mention of accommodations available.



# Use of Training and Operational Software

• The primary operations/scheduling software that is used by both students and employees does not have significant accessibility features embedded into the design.

#### Program Development

• No current processes on accessibility considerations when developing new programs and services.

# Program and Service Delivery

- Required textbooks or groundschool materials are not available in alternate formats.
- No policies, programs or training currently being provided on delivering accessible customer service.

#### Student Records

• Not available in alternate formats.

#### Employee Awareness and Training

- Lack of awareness of potential accommodations available to person with disabilities to get a Civil Aviation Medical.
- Instructors have limited knowledge and awareness on the barriers experienced by customers with disabilities and options available for accommodation.
- Instructors have not received any training on how to modify activities to accommodate persons with disabilities.



#### Short Term Action Items

- 1. Within 12 months, ensure the accessibility committee is being consulted when designing new programs, delivery methods and services.
- 2. Within 12 months form an Accessibility Committee, that has invited subject matter experts, when developing new or changing existing programs. Aiming to ensure new barriers are not created or, if currently existing, can be removed or lessened.
- 3. Within 6 months ensure that all new program applicants are asked if they require any forms of accommodation to successfully complete their training. This will be done by adding statements on the admissions form, website and in responses to email enquiries that if candidates require assistance, they can contact our Accessibility Coordinator.
- 4. Within 6 months the senior flight instructional team to conduct a review of Transport Canada regulations and medical standards to understand the allowances that can be made for persons with disabilities for both ground and flight training. All front-line instructors will receive training on this topic. Ensure that students requiring accommodations are only assigned to instructors that have received accessibility and accommodation training.
- 5. Review admissions documents to assess how they could be improved to meet accessibility guidelines and review processes to remove major barriers for persons with disabilities. This will be completed within 12 months.

# Long Term Action Items (12-36 months)

1. Continue to coach and train team members on best practices in customer service and program delivery at least annually or within 6 months of initial hire.



- 2. Ensure program outlines, student policies, training contracts and groundschool material can be provided in an alternate format if required. Complete within 24 months.
- 3. Within 18 months, develop a policy on accessible customer service. We will seek input from persons with disabilities when developing this policy to make sure it reflects their needs. Our policy will cover topics such as communication supports, front-desk accessibility, service animals and documents in alternate formats. Provide training on this policy and available accommodations for all front-line staff and managers within 24 months.
- 4. We will update admissions documents to improve accessibility for persons with disabilities, within 36 months.

# 6. Procurement of Goods, Services and Facilities

Montair Aviation buys (procures) goods and services as part of our work and as tools for our students.

We aim to learn more about how and when we should include accessibility in our processes to improve how our procurement practices to address accessibility barriers.

#### <u>Goal</u>

To embed accessibility into our procurement process and communicate our accessibility expectations and requirements with suppliers.

#### Areas Reviewed and Findings

#### *Outside Venues*

• No accessibility checklist to evaluate the accessibility of these spaces e.g. meeting spaces, corporate events.



# Procurement Policies

• No policies currently exist to promote accessibility.

# Short Term Action Items

- 1. Ensure accessibility considerations are made in purchasing principles and responsibilities by developing a procurement policy to reflect this, within 12 months.
- 2. Provide employee training to those responsible for procurement decisions so they have the knowledge to understand the needs of people with disabilities. Complete within 12 months.
- 3. Within 6 months, begin asking contractors and consultants to tell us how the products and services they provide will be accessible and if they have any accessibility requirements to deliver their services.

# Long Term Action Items (12-36 months)

- 1. Assess equipment and products currently in use and look at options for alternatives that may increase accessibility, within 24 months.
- 2. Ensure products being procured for resale have accessibility accommodations within 3 years.
- 3. Continue to evaluate current procurement policies, processes and tools to improve accessibility, at least on an annual basis.



# 7. Transportation

Montair does not coordinate a transportation system, or a fleet of vehicles as defined in the Accessible Canada Act. However, under this category we reviewed other company practices and policies related to transportation.

#### <u>Goal</u>

To reduce or remove barriers for employees and clients with respect to any activities involving transportation.

# Areas Reviewed and Findings

# Company Travel

 Montair employees are not usually required to travel as part of their employment. On the occasions when it is required, there are currently no policies available that consider accessibility and barriers. For example, accessible hotel rooms and transportation or ensuring accessible venues and transport for employees attending other off-site company events.

#### Vehicles

- The company owns vehicle(s) that are used by employees for work purposes, but none have adaptations available, and no policy exists to provide accommodation processes if needed.
- The parking lot used by employees and clients does have reserved wheelchair accessible spaces.

#### Short Term Action Items

1. Review company policies and procedures to ensure that employees' accessible transportation needs are met if required. For example, providing accessible taxi services, off-site venue accessibility, company mandated travel accessibility options.



2. Have an option available for an accessible taxi service for the local area, within 6 months.

Long Term Action Items (12-36 months)

- 1. Evaluate possible options available for an accessible vehicle when adding new vehicles to the company fleet.
- 2. Update the company's policies and procedures manual with respect to accessible transportation, within 24 months.



#### Training and Other Resources

The basis of completing many of our action plans is employee training. We are committed to improving the understanding of accessibility issues, promotion of diversity and inclusion, and knowledge on ways to identify, reduce and remove barriers.

As described in our action plans, we will research available options for delivering this training to our staff and develop our own as needed. The Accountable Executive will be asked to ensure that during the annual planning cycles, the budget includes an allocation to complete these items.

For more information and guidance on the Accessible Canada Act, Regulations and other resources:

Canadian Human Rights Commission: About the Accessible Canada Act

https://www.chrc-ccdp.gc.ca/individuals/accessibility/about-accessiblecanada-act

# Information on Video Relay Service (VRS)

https://crtc.gc.ca/eng/phone/acces/rela.htm



# **Conclusions and Future Goals**

Our Accessibility Plan sets out how we will identify, remove and prevent barriers for persons with disabilities. We will immediately begin working on our action items, track progress and complete regular reviews of how we are doing and what we can improve. We will publish a report annually to report our progress.

Many areas have been identified for improvements, but this is the first year of our planning and change will take time. However, we are committed to making these changes and working towards a barrier-free environment. When we make our company more inclusive and accessible for persons with disabilities, we make it a better and more diverse place to work. We are also able to improve the accessibility of our programs and services for everyone.

Perhaps our most valuable lessons are the importance of awareness of the challenges that persons with disabilities face. Staff training is key to increasing this awareness and making accessibility part of our company culture. We must improve how we actively look for the involvement of persons with disabilities when developing programs, policies, operational practices and facility changes.

This plan is just a starting point for making Montair barrier-free. To be truly inclusive, we need to build accessibility into everything we do. Every employee in our organization has a role to play, from our senior managers to our front-line staff.

We welcome and encourage feedback to help us improve our Accessibility Plan.



# Appendix A Online Survey Questions

Q1. What is your relationship with Montair?

- Employee
- Student
- Contractor or Service Provider
- Other (including member of the public with no direct connection to Montair)

Q2. Who do you identify with? (Please check all that apply)

- Individual with an accessibility need
- Caregiver of an individual with an accessibility need
- Another Individual or organization with direct knowledge of the requirements/needs for accessibility for persons with a disability
- Prefer not to say
- None of the above

Q3. Have you ever personally been unable to participate or complete any activity at Montair due to an accessibility barrier?

- Yes
- No

If Yes, please provide information on what the activity was and the barrier that prevented you from having full access.

Q4. Based on the following scale, please rate the importance to you on the following areas. These will help Montair set our priorities for making improvements to accessibility.

Use the following scale:

- Least Important
- Somewhat Important
- Important
- Very Important



- Extremely Important
- No knowledge or opinion
- a. Programs and Services Design and Delivery

Provide training programs and services that are accessible to all

b. Accessible Information and Communication

Communication and information provided is accessible to all. Communication technologies (such as software and websites) are designed to prevent barriers.

c. Built Environment

Ensuring all areas of buildings are accessible to all

d. Equipment

Ensuring all equipment, tools and resources are accessible to all

e. Accessible Employment Practices

An inclusive and accessible work environment focused on attracting, hiring and retaining a diverse workforce that includes individuals with disabilities

f. Accessible Procurement Practices:

Ensure goods and services purchased (including those provided or sold to clients) are accessible by design

Q5. What barriers do you observe or encounter at Montair?

- Physical access, for example, stairs, doors and other obstructions
- Vision, for example, dark stairwells or rooms, obstacles you cannot see well, documents you cannot see well
- Hearing, for example, at a presentation or meeting
- Sensory, for example, loud noises, poor lighting, uninvited touching
- Cognitive, for example, materials or teaching methods that are difficult to understand or remember
- Overall environment, for example busy or crowded hallways and rooms



- Mental health, for example, anxiety, depression
- Other
- I cannot identify any barriers for what I need or want to do at Montair

Please provide any more information on why the factors you identified above are a barrier to you.

Q6. Specifically related to the delivery of Montair's flight and ground training programs, do you have suggestions on what we could do to improve accessibility and remove barriers for persons with disabilities?

Please provide details below.

- Q7. Can you provide any other ideas on what Montair could do to improve accessibility and/or remove barriers in relation to these other areas:
- The Building and Built Environment
- Communication (written and spoken)
- Information and Policies
- Use of Communication Technologies (such as computer hardware or software, websites, social media)
- Procurement (buying and renting things)
- Employment

Q8. Can Montair contact you if we have more questions?

- Yes
- No

Q9. Please add any additional comments or feedback you would like to share regarding the development of our Accessibility Plan.



# Appendix B Management Survey Questions

#### The Built Environment

- Does the Montair Aviation facility have an accessible washroom?
- Does the Montair Aviation facility have accessible entrances and exits?
- Are employees with a physical disability able to access the building and all rooms/spaces within the building?
- Are clients or service providers with a physical disability able to access the building and all rooms/spaces within the building?
- With respect to building alterations or upgrades that have taken place in the past, or those that are planned, are you aware of any discussions to ensure these modifications allow for accessibility by persons with a disability?
- Does the building have accessible internal signage e.g. Braille, tactile lettering, luminescence/contrast adaptations?
- Do the emergency systems in the building (fire alarm or other security system) allow for both visual and auditory clues when activated?
- Do counters, desks and workspaces meet accessibility standards for students with disabilities?
- Has the Emergency Response Plan been reviewed to ensure it can be used or has modifications for person with a disability?

# Communication (other than Information and Communication Technologies)

- Are company documents available in alternate formats, or are service providers in place to provide these alternate formats on-demand?
- Is consideration currently given when preparing documents and communications to ensuring accessibility e.g. choice of font style, size, alternate formats?



- Are there presently any policies guiding the development of both internal and external documents to ensure they meet accessibility standards?
- Do company communication tools for example, computers, phone systems, POS machines etc. have adaptive technologies that you are aware of, so they can be used by persons with a disability?

# Information and Communication Technologies

- Do you consider that the company's primary operations software (FSP) is accessible i.e. available in alternate formats, for persons with disabilities?
- Do you consider that the company's other IT systems are accessible for persons with disabilities?
- Are you aware if Montair's website is complaint with the Web Content Accessibility Guidelines?
- Does the company website have provisions for persons with a disability such as use of alt-text, audio transcriptions etc.?
- Are there any immediate and specific plans to include any information on accessibility for persons with disabilities on the company's website?
- Are any rooms equipped with aids to assist persons with disabilities e.g. induction loops, handrails, specific phone systems etc.

# Employment

- Do the company's hiring processes currently encourage and allow for applicants with disabilities, by promoting inclusion in job postings and providing accommodations (e.g. applications in alternate formats) during the hiring process?
- Are there provisions available for persons with disabilities, to ensure that they could receive all required training and complete their tasks without barriers?



- Have all job descriptions been reviewed to ensure removal of any systemic bias?
- In your opinion, is Montair inclusive to hiring persons with a disability and has the resources to do so, providing equal employment opportunities for all?
- Have company employees been provided with any training on the Accessibility Act, an inclusion training plan and the prevention and removal of barriers to persons with a disability?

# The Design and Delivery of Programs and Services

- Does the company have a policy for clients that promotes an accessible training process?
- Is the admission process available in alternate formats for persons with a disability?
- Is the head of training familiar with the standards of training and medical validity that allow for flight training and medical issuance for persons with disabilities?
- Are instructors aware of and/or received training on accommodations and modifications that can be utilized for the training of persons with disabilities?
- Are you aware of whether training materials for students are available in alternate formats e.g. Braille, audio?
- When new programs or program revisions are being discussed or implemented is there currently, or has there been discussion on barriers and accessibility?

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#### **Procurement of Goods and Services**

- When vendors are contacted to provide services are there any discussions on accessibility requirements?
- When discussing the procurement of goods and services for the use of Montair or its clients, is there a policy or any consideration on accessibility and the promotion of inclusion?
- If the company operates its own vehicles, are adaptations available for employees with disabilities so that they also have equal access to employment in positions that require the use of these vehicles?

#### Management Awareness

- Are you familiar with the requirements of the Accessibility Act?
- Have you received any training on the requirements of the Accessibility Act and/or how persons with a disability can be accommodated in either the work or training environment?
- Is there currently an audit program in place with respect to assessing compliance of equipment, facilities, procedures, policies etc. with the Accessible Canada Act?
- Is there currently a budget in place to allow for accessibility improvements?