



2024-2027

Accessibility Plan



Wilson's Transportation is grateful to be on the shared, unceded territory of the Lekwungen People, known in their language as Lək̓ʷəŋən represented by the Songhees and Esquimalt Nations and the W̱SÁNEĆ peoples represented by the Tsartlip, Pauquachin, Tsawout, Tseycum and Malahat Nations. We respect and commit to a deep consideration of their history, culture, stewardship, and voice.

Section 1: General

Executive Summary

At Wilson's Transportation Ltd. our commitment to accessibility is rooted in our values, which guide us to include everyone. We will contribute to a barrier-free Canada for everyone by building an accessibility framework that will support employees and the public we serve have the best experience possible with our service, products, and facilities.

Our efforts to achieve accessibility are deeply connected to, and mutually reinforced by:

Wilson's priorities, including ongoing work in support of equity, diversity, and inclusion legislation, such as the *Canadian Human Rights Act*, the *Canadian Charter of Rights and Freedoms*, the *Canadian Labour Code* and the *Employment Equity Act*.

We recognize that accessibility is an ongoing and central element of being an inclusive organization. That's why the plan we've developed to continue improving our accessibility builds on our inclusive mindset and practices.

Through the plan's development we identified barriers and actions to improve accessibility in the priority areas under the *Accessible Canada Act*. We have also looked at leading practices from other organizations, and consulted with the Intercultural Association, Our Place, and roundtable discussions with employees to help identify other opportunities for improvement.

Change takes time, and this plan will guide us in our efforts to improve accessibility over the next three years.

Your Input and Feedback

Wilson's Transportation Ltd. welcomes feedback on our Accessibility Plan from the public, employees and our stakeholders. This feedback is valuable to us as it helps us break down accessibility barriers and build on our commitment to accessibility and inclusion.

If you have any inquiry or feedback, please use one of the contact methods below. We will respond to all feedback in a timely manner. If you require support while providing feedback let us know and we will do our best to accommodate your needs.

By email: HR@gowilsonsgroup.com

By mail: 1925 Blanshard St, Victoria, BC V8T 4J2

By telephone: 778-405-0231

If you need an alternate format of this accessibility plan, please email: HR@gowilsonsgroup.com



Our Accessibility Statement

At Wilson's Transportation Ltd. we are committed to making our organization and the services we provide accessible to all, including persons with disabilities. All individuals have the right to benefit from our services equally and those who work with us have the right to perform their jobs free of barriers.

Acknowledgements

We want to thank everyone who participated in our consultations. Without learning about those lived experiences, we wouldn't be able to reach our goal of being barrier free by 2040.

Reporting Our Plan

As required by the *Accessible Canada Act*, we will publish a status report annually that measures our progress against our commitments. We will also review and update our Accessibility Plan every three years.



Provisions of the Canada Transportation Act (CTA) - Accessibility Related Regulations

As a federally regulated transportation service provider, Wilson's Transportation Ltd. is subject to the regulations of the Canada Transportation Agency (CTA), which are made under 170(1) of the *Canada Transportation Act: Accessible Transportation for Persons with Disabilities Regulations (ATPDR)*.

Wilson's Transportation Ltd. welcomes all passengers and strives to provide an equitable booking, check-in, and motorcoach travel experience.

We are subject to the following sections of the *Accessible Transportation for Persons with Disabilities Regulations (ATPDR)*. Wilson's continuously works to improve our adherence and implementation of these regulations that we are subject to:

4, 5, 6, 7, 8, 9, 16, 17, 18 (a) (b), 19, 20, 21, 22, 23, 25 (d), 31, 32 (4), 34, 35, 36, 37, 38, 41, 43, 47, 48, 49, 50, 51, 52, 54, 55, 56, 57, 58, 59, 60, 61, 221, 223, 225, 227, 229, 230, 231

Addressing Areas Identified in the Accessibility Canada Act (ACA)

Employment

Accessibility must be ensured at every stage of employment. This means accommodation must be made available upon request as reasonably possible with accessibility in mind when creating new policies, processes, and practices as necessary.

Our Desired Outcome:

- Wilson's Transportation Ltd. attracts qualified candidates with disabilities according to their availability on the labour market for our occupations. Additionally, Employees with disabilities report being treated with respect at a level that matches those of all employees.

Barrier #1

Expand understanding of the range and variety of accommodation options available to persons with disabilities.

Action:

- Seek external consultation with organizations like the Victoria Disability Resource Centre, and virtual seminars.

Barrier #2

Our current number of job applicants and employees hired with disabilities is lower than labour market availability.

Actions:

- Enhance the careers section of our website to increase visibility of Wilson's Transportation among Canadians with disabilities and signal our commitment to their inclusion in our workforce.
- Educate hiring managers on accessibility and how they can ensure barrier-free hiring, selection, and accommodation process.
- Benchmark current recruitment, selection, and onboarding practices against leading accessibility practices.

The Built Environment

The built environment comprises human-made structures, features, and facilities—it's the physical environments where people live and work.

Wilson's Transportation Ltd. leases and conducts business out of various locations; however, Capital City Station and Wilson's Head office were found to have identifiable accessibility barriers via consultation. Although we've tried to create a welcoming, accessible and inclusive work environment, the *Accessibility Act* has given us a chance to update our existing worksites to make sure they comply with best practices.

We will use a phased approach over the next three years, based on existing and planned projects. Such as prioritizing bathroom renovations at Capital City Station to fast-track accessibility for customers and staff.

Focusing first on high impact renovations and changes that have low costs and completing larger-scale upgrades over the longer term. Such as the metal transition floor strips placed at the base of the doors at the Capital City Station by the City of Victoria.

We also own and operate a number of fleet vehicles across Vancouver Island and Mainland Area. When possible, we will work with our on-site managers to improve these spaces as needed.

Our Desired Outcomes:

- All Wilson Transportation buildings that we lease or own are easy for employees, visitors, and customers with disabilities or mobility issues to access.

Barrier #3:

Limited employee office space available on the 2nd floor. Admin office space is not fully accessible or equipped with an elevator lift or an equivalent mobility device.

Actions:

- We have adequate space on the main floor to accommodate the growing staff and will ensure that anyone with mobility concerns has a main floor office.
- Employees working in the office will have access to Microsoft Teams to ensure people can connect with the team upstairs quickly and do not feel the need to go upstairs.
- If an attendee of an in-office meeting has mobility issues, the meeting will take place on the main floor.

Barrier #4:

There is no electric swing automatic door operator installed as well as metal transition floor strips have been placed by the property landlord at Capital City Station and has been identified as a hazard to those with mobility issues.

Actions:

- Reaching out to the City of Victoria as the landlord of the Capital City Station location to find a better solution regarding the recently installed metal transition strip in a way that it would not cause a risk of scooters, walkers, luggage to get stuck risking a fall hazard.
- Making the City of Victoria as the landlord aware of the accessibility issues.

Barrier #5:

Lack of accessibility features in the Capital City Station bathroom.

Actions:

- Working in tandem with the landlord (City of Victoria) to aid in the renovation of the Capital City Station bathroom.
- Capital City Station bathroom will be renovated with accessibility in mind. Insuring the addition of mobility grab rails where needed, the removal of unlevelled flooring and removal of a ramp to make a levelled floor to help those with mobility issues.
- The bathroom will accommodate space for mobility aids as well, such as wheelchairs and motorized scooters. Allowing for a fully inclusive gender-neutral bathroom for all staff and customers.

Information and Communication Technologies (ICT)

Information and communication technologies refers to the various technological tools and resources used to transmit, store, create, share, or exchange information.

As society relies more and more on sharing and communicating information digitally, we'll work to make sure that accessibility is considered from the start of every sales marketing project. We want to make sure that our information and communications technology products, services and digital content can be accessed and used by all.

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

We also understand that not everyone is a user of technology or has access to technology, as frontline staff do not have a company email, nor we do not have a large enough infrastructure to facilitate or house a corporate intranet. Therefore, a new Human Resources Information System (HRIS) will allow front line staff or any email without access to a company email to be able to find resources and policies they need as well receive newsletters to stay informed on the company announcements and new.

Our Desired Outcomes:

- An increase in available self-serve technology and accessibility features enhances employee independence and participation.
- Persons with a disability have full access to use our technology, as reasonably as possible.

Barrier #6:

The booking software used by customers when looking to book our scheduled services have accessibility capabilities however, they are not being used in an accessible way.

Action:

- The adding of additional features (i.e. plugins) for different languages to be available on Wilson's website for customers of different backgrounds for a more comfortable experience using our website.

We understand that not everyone is a user of technology or has access to technology, as frontline staff do not have a corporate email, nor we do not have a large enough infrastructure to facilitate or house a corporate intranet.

Barrier #7:

No efficient or consistent way to ensure alternative formats of communication issued to front line employees who do not have company emails or MS Office are available and provided in a convenient, timely, and accessible manner.

Actions:

- Implementation of new HRIS (human resources information system) that allows employees access to company information and policies outside of work increasing the utilization of multiple forms of communications technologies.
- Implementation of a monthly employee newsletter sent to employees' personal emails, allowing frontline staff who do not have access to a company email to be well informed as well.

Communication, other than ICT

The communication priority area recognizes that people give, receive, and understand communication in different ways. An organization is expected to take these differences into account and provide its communications in various accessible formats for people who require them. Some examples of communication products include signs, wayfinding, documents, forms, bills, and receipts that are not technologically based.

Our Desired outcomes:

- ensure the accessibility of key documents, internally and externally, for people who request them in an alternative format.
- responds to requests for key resources or publicly available documents in an accessible format in the same amount of time as for other document requests, or as directed by applicable legislation.

Barrier #8:

Wilson's does not have a uniform process to ensure alternate formats, such as braille or captioned audio, for the information and communications it issues to employees and customers.

Action:

- Catalogue and store documents and materials requested in alternative formats.
 - Provide key accessibility resources in alternative formats within a reasonable time.
 - The implementation of a live narration on Greyline Sightseeing Touring for customers who have the need for audio accommodation or hearing-impairment.
-

The Procurement of Goods, Services and Facilities

The Accessible Canada Act requires us to consider accessibility requirements for procurement and include accessibility as part of the provision of goods, services, and facilities, where appropriate (e.g., accessible technology, materials and amenities).

As a midsized company we originally found the need to not continuously update software. However, the use of older software creates barriers in training new employees as well as the complexity of the software requires technologically skilled workers, which could pose an accessibility challenge and barrier to some.

Our Desired Outcome:

- Accessibility becomes a part of our procurement expectations, and goods and services we purchase are accessible from the beginning.

Barrier #9:

Accessibility requirements are not considered in Wilson's Transportation's current procedures and practices.

Actions:

- Creation of a new procurement guidelines to include an accessibility checklist when buying goods and services and vendor selection.
 - Procuring user-friendly software that is technologically updated and accessible to use for the booking of scheduled services and charters.
-

The Design and Delivery of Programs and Services

When designing and delivering Wilson's Transportation Ltd. internal and external programs & services, accessibility considerations must be part of the process.

Our Desired Outcomes:

- Collaborating with staff to identify and implement the delivery of programs and services that are beneficial, user friendly and increases productivity.

Barrier #10:

Currently there is a limited and outdated standard approach for ensuring all programs and services have taken accessibility into account.

Actions:

- Refresh older approaches and create a new accessibility checklist to help ensure key accessibility considerations are considered.
- Provide awareness training to support frontline staff in promoting and providing accessible services.

Transportation

As a leading transportation provider on Vancouver Island, Wilson's Transportation Ltd. owes our ongoing success to the professional fleet of individuals who make up our team. We view our personnel as valued members of our family and are committed to supporting them in all matters of employment and accessibility.

Our Desired Outcomes:

- Better understand gaps in transportation systems.
- Study barriers to affordable transportation and how they can impact equity groups in Canada.
- Have all transit operators well trained on assistive equipment.

Barrier #11:

The requirement of having a valid Class 2 commercial vehicle operating license with air brakes endorsement is our largest job classification at Wilson's Transportation. Obtaining the necessary qualifications is a barrier to people with disabilities.

Actions:

- Approach industry experts to identify barriers and actions we can take to accommodate and modify our primary job.
- Update safety guidelines to reduce repetitive motion or motor disabilities that are common for drivers (i.e. additional grab handle to enter vehicle, traction strips on the ground etc.).

Barriers #12:

Wilson's Transportation fleet has a variety of transportation vehicles which are not all equipped with the same added features, meaning that Drivers are not all trained in utilizing the unique accessibility features on all vehicles such as operating the lift and accommodating and supporting customers with mobility aids (such as walkers, wheelchairs, motorized scooter etc.)

Actions:

- Ensure drivers are retrained and refreshed in how to use accessibility features on the vehicles they drive.
- Provide employees with support on how to support customers efficiently when or if they use mobility aids.
- As we operate across Vancouver Island to the Mainland, we employ from a variety of locations dependent on employment needs however we understand that we operate and employ from high and low population dense areas and understand when employees do commute from low density area, issues with transportation are common.
- Wilson's Transportation Ltd. embraces the green movement and the necessity to contribute to a greener and cleaner environment.

As we operate across Vancouver Island to the Mainland, we employ from a variety of locations dependent on employment needs, however we understand that we operate and employ from high and low population dense areas and understand when employees do commute from low density area, it can take longer and or be more expensive.

Wilson's Transportation Ltd embraces the green movement and the necessity to contribute to a greener and cleaner environment.

Barrier #13:

Many employees travel long distances to attend work.

Actions:

- Securing parking for some fleet vehicles from the Sidney parking yard to Downtown Victoria, shortening the distance employees need to commute and lower costs for them.
- Partnering with organization to provide employee discounts on gas and transportation needs

Culture

Barrier #14:

As an equal opportunity employer, there currently is no flexible accommodation for employees that follow different calendared holidays.

Action:

- To make Wilson's more culturally accessible, creating a policy that would allow those who wish to substitute a federally recognized statutory holiday for a religious holiday or day of their choosing. (For example, if Australian employee who wanted to celebrate Anzac Day instead of Victoria Day; they would work on Victoria Day at a regular rate and on Anzac Day they would be paid as if it were Victoria Day.)



Consultation

To align with Wilson’s commitment to make our workplace environment accessible to all, we have developed our initial Accessibility Plan in consultation with leaders of key areas to support to development of identifying barriers, employees with disabilities through an internal survey and subsequent follow up conversations, as well as an initial review conducted with the Intercultural Association (ICA) and Our Place Society in Victoria BC.

We will continue to survey employees as well as consult with external organizations that

have been referenced in this Accessibility Plan and measure progress to ensure we meet the commitments we set out to achieve.

The Company understands that collaborating with persons with disabilities is an important factor in developing an Accessibility Plan. Wilson’s consulted with the Intercultural Association (ICA) and Our Place Society prior to the development of this Accessibility Plan (the “Consultation”). The Consultation process was two-fold and included:

1. An internal and external survey
2. Virtual Meeting with ICA

3. On-going consultation with Our Place Society
4. Round table discussion with employees

The first facet of the Consultation consisted of ICA providing feedback on their own experiences and the difficulties their clients face.

The second facet of the Consultation included in-person discussions that were

facilitated by a staff member of Our Place Society. These discussions posed questions and asked for input regarding the barriers faced by persons with disabilities, including, physical, attitudinal, technological and communication barriers. These conversations also asked for input on recommendations for improving policies and procedures to support persons with disabilities, and for recommendations on the inclusiveness and accessibility of events and activities.

Lastly, by having ongoing discussions with employees regarding on-the-job accessibility and barriers in the day to day that they may face.

Definitions

Accessibility – Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services, and facilities are built or modified so they can be used and enjoyed by persons of all abilities.

Barrier – The Accessible Canada Act defines a barrier as “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 – The Accessible Canada Act defines a disability as “any impairment including anything 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, interaction with a barrier, hinders a person’s full and equal participation in society.



Even small changes can have huge impacts.