



2024-2027

# Accessibility Plan



*Smith Transportation is grateful to be on the shared, unceded territory of the Coast Salish Peoples, the traditional territories of the Snuneymuxw First Nation. We respect and commit to a deep consideration of their history, culture, stewardship, and voice.*

## Section 1: General

### Executive Summary

Smith Transportation Ltd. operating as Vancouver Island Coach Lines & School Bus Company (hereon 'VICL') is committed to building a culture of inclusivity and accessibility. Not only is this part of our company culture but opening access to all is imperative to our continued growth and competitiveness as an employer in the transportation sector. 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 without service, products and facilities.

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

VICL'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 know creating a barrier-free environment takes time and we are dedicated to the ongoing identification, removal, and prevention of barriers. VICL will build on our current efforts through the development of our initial Accessibility Plan as required under the *Accessible Canada Act*. This Accessibility Plan will guide our organization in meeting our accessibility commitments and in building an accessibility-confident culture.

To address gaps in these areas, it is important to recognize and understand the needs of those with disabilities. For this reason, this plan was developed in consultation with external community organizations that work with and serve people who identify as having a disability as well as consulting with employees via employee surveys, and roundtable discussions.

### Your Input and Feedback

Smith 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](mailto: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](mailto:HR@gowilsonsgroup.com)

### Our Accessibility Statement

At Vancouver Island Coach Lines, 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 duties 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.



## Addressing Areas Identified in the Accessibility Canada Act (ACA)

### Employment

VICL provides Charter Services for groups, private functions, scheduled service ski bus as well as school bus services. Being a family owned and operated LC our employees are what make VICL thrive the way it has, therefore, 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:

- VICL 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 Nanaimo 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 VICL 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.

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## The Built Environment

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

VICL leases and conducts business out of various locations. 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 barrier free facilities to fast-track accessibility for customers and staff.

Focusing first on high impact projects and changes that have low costs and completing larger-scale upgrades over the longer term. Such as clearing access points by relocating shelves in high traffic areas. (see appendix figure #1)

We also own and operate a number of passenger coaches and school buses in Greater Victoria (Langford) and Nanaimo. When possible, we will work with our manager to improve these spaces as needed.

**Our Desired Outcomes:**

- All VICL buildings that we lease or from which we operate from are easy for employees, visitors, and customers with disabilities or mobility issues to access.

**Barrier #3:**

Walkways are narrow and inaccessible due to added optional fixtures disallowing mobility aids to enter easily.

**Action:**

- Relocating shelving and supply boxes to create more space.

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## 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 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 life 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 #4:**

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 Human Resources Information System (HRIS) that allows employees access to company information and policies outside of work increasing the utilization of multiple forms of communications technologies.
- Implementation of a quarterly 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 #5:**

VICL 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.

### **Actions:**

- Catalogue and store documents and materials requested in alternative formats.
- Provide key accessibility resources in alternative formats within a reasonable time when requested.

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## 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 mid-sized 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 #6:**

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

**Action:**

- Creation of a new procurement guideline to include an accessibility checklist when buying goods and services and vendor selection.
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## The Design and Delivery of Programs and Services

When designing and delivering VICL's 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 #7:**

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

**Action:**

- Provide awareness training to support frontline staff in promoting and providing accessible services.
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## Transportation

VICL owes its' 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 #8:**

VICL's 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.

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## Culture

### Barrier #9:

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

#### **Action:**

To make VICL more culturally accessible, create 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 Smith Transportation'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 the 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).

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. Smith consulted with the Intercultural Association (ICA) and employees and the community prior to the development of this Accessibility Plan (the “Consultation”). The Consultation process included:

1. An internal and external surveys with staff and the community.
2. Virtual Meeting with ICA.
3. Round table discussion with employees.
4. Speaking with other departments to learn their best practices.

The first facet of the Consultation consisted of a questionnaire completed by both the

community and staff. ICA provided feedback on their own experiences and the difficulties their clients face in relation to accessibility.

The second facet of the Consultation included a virtual discussion with the ICA providing feedback on their own experiences and the difficulties their clients face.

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 of 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.*