

Housing Justice Workshop on Legal issues pertaining to Housing – May 2012

Summarized by Lindsay Neufeld, MA Student, SCARP and Malcolm Funt, Law Student, UBC

The Housing Justice project held a half-day workshop on May 28th where an invited group of stakeholders with expertise on issues and solutions regarding affordable housing discussed in small groups their viewpoints and experiences. The diversity of the participants led to a solid discussion of the realities of affordable housing in Vancouver and some of the issues that are seen frequently by members of the community.

The discussions included rotating groups at five tables. The topics that were discussed were:

1. The Preservation of Affordable Rental Housing Stock
2. Discrimination
3. People who fall outside of the Residential Tenancy Act
4. Affordability and Adequacy
5. Housing Conditions

Each of these tables has been individually summarized below, the purpose here is to draw out some of the major themes that resonated throughout the discussions.

Vulnerability

One aspect that was prevalent at every table was the vulnerability of people in precarious housing situations. Whether due to drug additions, mental health issues, abuse, seniors or family responsibilities, these people were most often discussed as the people in core housing need. This may seem intuitive, but the key point to consider is that because of these vulnerabilities, many of the government programs are inaccessible or unrealistic. The Residential Tenancy Act for example has a number of protections for tenants, however if these protections are inaccessible due to the tenant being in a vulnerable situation they become ineffective and inadequate.

Adequacy

Poor housing conditions and inadequate rental situations are major concerns for health, safety and general well-being. This is true in both non-market housing and market rentals. There seems to be a general attitude that the housing market is so competitive and affordable housing alternatives so few that people should be forced to put up with whatever they have. Further, this leads to problems of renovictions, where buildings in need of maintenance are renovated and tenants are forced out. Lack of affordable alternatives and a decreasing supply of rental housing further exacerbate these problems.

Advocacy and Education

Accessibility of advocacy services, legislative protections and government programs was another major issue brought out throughout the discussion. A common comment was that advocates are spread too thin and do not have the time or knowledge to give consistent, meaningful advocacy. Further, there was a repeated call for communication and coordination among groups to educate the public and provide advocacy for individuals in need.

Solutions

There seemed to be enthusiasm for a provincial government policy proposal for the upcoming Provincial election. Further, suggestions for a social media communication network among advocacy groups could enhance the support given to individuals.

Discussions at each table took place in three separate sessions, each with 3-7 participants. Though each discussion unfolded differently, for the purposes of this summary the main points and issues raised in all three sessions have been compiled and grouped under thematic headings for each table.

Table #1 – Preservation of Affordable Rental Housing Stock – Nathan Lauster

Contributors:

- Session #1: Emma Lazo (Tenant Resource and Advisory Centre – TRAC)
Am Johal (Vancity Office of Community Engagement)
Andrew Sakamoto (Tenant Resource and Advisory Centre – TRAC)
- Session #2: Aerlyn Weissman (West End Residents Association)
Kalin Stoyanov (Vancouver Resource Society)
Scott Clarke (Aboriginal Life in Vancouver Enhancement Society)
Tom Laviolette (PHS Community Services Society)
- Session #3: Grace Tait (Aboriginal Life in Vancouver Enhancement Society)
Yuri Artibise (PlaceSpeak)
Eugene Kung (BC Public Interest Advocacy Centre – PIAC)
Patti Fraser (community engaged artist)
Didi Dufresne (First United Church)
Ivan Drury (Downtown Eastside Neighbourhood Council)

The purpose of this discussion was to understand the problems respecting the decline in the stock of affordable rental housing, and to enhance ideas that address these problems.

The number of rental housing options has decreased in Vancouver. Property values have risen dramatically and condominium development has become much more profitable than rental apartments. As a result, the destruction or renovation of previously affordable apartments has reduced the supply of affordable options for lower-income renters. Problems that have resulted in this shift in property fundamentals include 'renovictions,' increased dependence on SROs as a last resort housing option, gentrification of certain areas in Vancouver, and limited mobility for people with disabilities.

Further, rents have increased at a much faster rate than incomes for the population as a whole, and especially for fixed-income seniors and those on welfare. This means that as the stock of rental housing diminishes due to development, the affordability of the remaining rental units has decreased.

The discussion yielded five major ideas that could be utilized to preserve the affordable rental housing stock.

Moving market to non-market

Urban Land Reserves are a possible way of maintaining affordable housing. The reasoning is that by designating a certain area as a lower-income housing area, and by informing potential buyers of this designation, the value of the land would drop to a price that would provide a reasonable return for the development of low-income rental housing. An alternative to this that was suggested would be to have non-profits or BC Housing purchase properties as a means of removing them from the market and maintaining lower rental levels. This strategy has been employed by BC Housing with the purchase of SRO hotels.

Maintaining and Repairing Existing Rental Stock and Tenure Protection

Much of the existing rental units are in need of repairs. A major problem that has resulted from this need is that tenants are increasingly being forced out either during renovations or effectively forced out due to the increased rent charged after renovations. As a result, the question becomes how is it possible to repair the existing rental stock without alienating low-income tenants.

One aspect is education, as the group stated that tenants need the ability and legal literacy to fight for their interests. For example, the West End Residence Association is holding a workshop this month to inform and educate tenants on their legal rights regarding renovations and tenancy. Further possibilities suggested include a right of first refusal for tenants, and government programs by BC Housing or CMHC to incentivize the maintenance of low-income rental housing, such as the recently expired RRAP program.

Coordinating housing providers and other service groups

The discussion groups pointed to a lack of coordination and cohesion between different organizations. One suggestion was government involvement to coordinate non-profits, although it was argued that this might be too intrusive. Another suggestion was to get all the information from different organizations compiled into social media so that different groups have access to what others are doing. The main focus was that groups need info on what outcomes they are looking for.

Refine regulations for landlords and educate

The argument was made that affordable housing lacks substantive regulation and enforcement standards. Further, the city lacks a definition of affordability, and legislation creates a loophole that allows for renovations to be possible when tenants do not know their rights. The main recommendations were that education and policy changes would be effective in closing these legislative loopholes and protecting tenants.

Living wage

The final suggestion was to institute a living wage. There are two determinants of affordability, one being the price, the other income. Much of the previous recommendations and proposals are aimed at reducing price, however, an alternative would be to institute a living wage for all low-income people. This would have the effect of increased affordability without direct invention into market prices.

Additional Issues

- Increased rents – specifically affecting people with fixed incomes.
- Increasing property values and loss of tax incentives for rental housing has led to an increased number of renovations. Developers and owners want to renovate and re-rent.
- Incomes are not increasing at rate of inflation – especially on subsidy programs
- Some of the biggest rental stock issues are in the suburbs – less advocacy
- Mobility and supply are major issues for people with disabilities.
- Raised prices on rental units after being scaled up when fixed are not counted as losses of rental units because losses are calculated by whether or not they are a residence, not the price.

Potential Solutions

- Information on rental housing stock numbers, property owners map.
- Rental rate control needs to be revisited.
- Build block associations with block captains so there is a connection to people and gather information.
- Take land off the market – purchase land in targeted areas to remove it from market forces. Could also designate certain areas as Urban Land Reserves, which reduces potential development options and thus makes it possible to build affordable rentals.
- Government coordination of non-profits
- Right of first refusal

Table #2 – Discrimination – Darcie Bennett

Session #1	Patrick Stewart (Aboriginal Homelessness Steering Committee - AHSC) Kate Gibson (WISH Drop in Clinic) Arthur Paul (Native Courtworker and Counselling Association of BC) Eugene Kung (BC Public Interest Advocacy Centre) Mishi Campbell (Vancouver & Lower Mainland Multicultural Family Support Services)
Session #2	Grace Tait (Aboriginal Life in Vancouver Enhancement Society – ALIVE) Corin Browne (community engaged artist) Leslie Stern (Lower Mainland Network for Affordable Housing) Kate Hodgson (Network of Inner City Community Services)
Session #3	Kim Bayer (BC Society of Transition Houses) Marilyn G.D. (Kiwassa Neighbourhood House) Alyssa Stryker (BCCLA) Aerlyn Weissman (West End Residents Association) Stephanie Smith (MOSAIC)

The purpose of this discussion was to focus on where and how discrimination occurs in the housing system, and the people who are affected by discriminatory practices. Further, an understanding of why discrimination occurs may lend itself to ideas for possible solutions to these problems. The goal is to get a sense of the big issues, figure out what is legally operable, and operable from a policy standpoint, and then reach out to affected communities. Taking legal action will require engaging with affected communities, which is a challenge in this kind of human rights based legal work on discrimination.

Tenancy discrimination is prohibited by section 10 of the BC Human Rights Code¹, which states:

(1) A person must not

(a) deny to a person or class of persons the right to occupy, as a tenant, space that is represented as being available for occupancy by a tenant, or

(b) discriminate against a person or class of persons regarding a term or condition of the tenancy of the space,

because of the race, colour, ancestry, place of origin, religion, marital status, family status, physical or mental disability, sex, sexual orientation, age or lawful source of income of that person or class of persons, or of any other person or class of persons.

However, despite this legislation, discriminatory practices are still seen throughout Greater Vancouver. This discussion covered a broad range of types of discrimination and focused on a number of key groups that are most highly affected by these practices. Although no clear strategy was formed for dealing with these problems, the discussion provides an avenue of understanding for groups to target and specific problems to be addressed by policy and programs.

¹ *Human Rights Code*, RSBC 1996, Ch 210, s 3.

Hidden and Unreported Discrimination

The most resounding problem is that discrimination is rarely explicit, and thus it is very hard to prove. Further, even if discrimination is clear, the people facing discrimination do not have the resources or accessibility to remedies that are available. The challenge is to string a series of discriminatory instances together in order to create a narrative for a human rights case.

An information sharing tool or database would be useful for tenants to speak up against discrimination and raise awareness about potential discriminatory landlords. The City of Vancouver has instituted a public forum for tenants in these and other situations, which has been heavily criticized by landlords and apartment owner groups.

Stages of Discrimination

The initial instance of housing discrimination is by landlords not renting to tenants that are aboriginal people, single parents, young women aged 16-19 and mentally disabled people, among other. The participants noted that these discriminatory practices were evident across the board from individual landlords to property management companies.

Discrimination also occurs once the person is already a tenant. Landlords can discriminate against tenants by evicting them often illegally, or more informally using subtle tactics to force the tenant out. Although these actions are illegal under the RTA, families and people with drug addictions are two groups that are susceptible to coercive discriminatory practices.

Additional Issues

- People are often so vulnerable and won't complain because of this. Young mothers, youth, seniors, newcomer families.
- Basement suite conditions – don't understand basic rights, poor conditions. Ex: no fridges
- Lower provincial standards – People renting out basements under the
- Lack of non-profit availability
- Forced outside Metro Vancouver
- Aboriginal people stuck with being placed in DTES
- Lack of choice/options – leads to strong-arming by landlords, tenants must put up with conditions.
- Lack of communication between MCFD, BC Housing and Welfare
- Increasing landlord power – creates disparity.
- Lack of advocacy depth – need sustained help and response
- Idea that landlord is always right.
- Hard to share information and organize as tenants.

Possible Solutions

- Ombudsperson who could address issues of discrimination
- Database for landlord statistics – give place for reporting, and create accountability.

- Priority list for housing only available to women in transition house. This is a problem for women who do not want to go to a transition house – could remedy this by making priority list
- Union organizing model

Table #3 – People Who Fall Outside of the RTA – Margot Young

Session #1	Tom Laviolette (PHS Community Services Society) Marilyn G.D. (Kiwassa Neighbourhood House) Patti Fraser (community engaged artist)
Session #2	Kim Boyer (BC Society of Transition Houses) Kate Gibson (WISH Drop in Clinic) Alyssa Stryker (BCCLA) Am Johal (Vancity Office of Community Engagement)
Session #3	Scott Clarke (Aboriginal Life in Vancouver – ALIVE) Mishi Campbell (Vancouver & Lower Mainland Multicultural Family Support Services) Corin Browne (community engaged artist) Arthur Paul (Native Courtworker and Counselling Association of BC)

The purpose of this discussion was to explore people who are not covered by the protections of the RTA, either because they are technically outside the terms of the act or because the protections in it are inaccessible to them.

Section 4 of the BC Residential Tenancy Act stipulates that the act does not apply to a variety of housing arrangements, including cooperatives, educational institutions, health care facilities, emergency shelters, and first nations reserves. This means that RTA protections such as protections around eviction, security deposits, and rent increases are not available to people in those situations.

Despite the areas of non-coverage under the RTA, the experiences of the participants focused more on people who were technically covered under the RTA but lacked access to its' protections due to a lack of resources, advocacy or personal crises.

Crisis Mode

One of the biggest barriers to RTA protection seems to be that the people that need enforcement are in perpetual crisis mode. This means that often they are in housing situations that are not adequate to their needs, but due to being a single working parent, youth, having a mental disability or drug addiction, these people are not able to access the protections.

Further, it was stated that language barriers add another level to the depth of the problem because immigrants and people fleeing from abuse are already fighting a war, and that you have to be too together to access the RTA. Finally, the fungibility of low-income housing means that it is easier to just move on than to fight problems such as evictions

Advocacy

The availability of advocacy is critical for accessibility of RTA protections, however, government support for advocacy services has decreased, limiting the scope and effectiveness of advocacy

services. Lack of advocacy is a more drastic problem in suburbs and rural areas, where advocates are more scarce and less accessible.

A number of advocate participants in the discussion voiced their concern that they were spread too thin, making meaningful advocacy services rare due to lack of time and resources that could be spent on a certain file or problem.

One major suggestion that was emphasized in a number of the sessions was a call for coordination of advocacy services. It seems that there is a problem that different advocates are forced to become the jack of all trades and this limits effectiveness when the problem is outside their realm of expertise. The advocate at this point is forced to send the person to a different organization where there is little continuance or coordination between the groups.

The Residential Tenancy Act

As mentioned above, the RTA does not cover a number of housing situations. The effects of these gaps in RTA protection will need further examination. First nations reserves do not come under RTA protection as they are included under Federal jurisdiction. Further, cooperatives and many of the affordable housing options do not have the protections as well. The participants suggested that even though certain groups may not utilize protections granted in the RTA if they were covered by it, the RTA may be useful for setting standards simply by its' very existence. Essentially, this means that the threat of RTB proceedings due to more extensive coverage may lead to positive effects for tenants in precarious situations.

Accessibility to RTA proceedings was the underlying theme of all the sessions. People in crisis mode and without advocates are vulnerable to abuse of their rights by landlords and owners. The more easily vulnerable people can act on these abuses through accessing the RTA protections, the greater effect it will have.

Additional Issues

- Barriers to enforcement of protections expand into more subtle things that force people out of housing situations such as gossip, friends/tenants ganging up on the person, withdrawal of services subtly.
- Problems with hoarders.
- Changing demographics.
- Highly competitive housing situations, tenants feel like they should not access RTA protections for fear of repercussions. Gives landlords a lot of power.
- Long waitlists for affordable housing programs, creates an attitude of you should be happy for what you get.

Possible Solutions

- More funding for advocacy services
- Communication between groups and advocates
- Review of RTA coverage and effectiveness
- Further construction of affordable rental housing.

Table #4: Affordability and Adequacy – Penny Gurstein

Session #1:	Grace Tait (Aboriginal Life in Vancouver Enhancement Society – ALIVE) Yuri Artibise (PlaceSpeak) Stephanie Smith (MOSAIC) Kalin Stoyanov (Vancouver Resource Society)
Session #2:	Patti Fraser (community engaged artist) Andrew Sakamoto (Tenant Resource and Advisory Centre – TRAC) Marilyn G.D. (Kiwassa Neighbourhood House) Mishi Campbell (Vancouver & Lower Mainland Multicultural Family Support Services) Didi Dufresne (First United Church)
Session #3:	Kate Gibson (WISH) Kate Hodgson (Network of Inner City Community Services) Leslie Stern (Lower Mainland Network for Affordable Housing) Emma Lazo (Tenant Resource and Advisory Centre – TRAC)

Seesaw between affordability and adequacy of housing

One of the broad themes that emerged was the inextricable linkages between housing affordability and adequacy, with some participants likening the trade-offs to a “seesaw”. Housing that is affordable may not be adequate and housing that is adequate is often not affordable.

Reclassification of housing vulnerability

As housing vulnerability has shifted from being understood as an economic issue to being seen as a health issue, people with disabilities, seniors, and sometimes single parents are able to get nonmarket housing, while those who do not fall into these groups struggle to get housing and assistance. People who get nonmarket housing are then expected to be grateful for whatever they get, even as they are deprived of limited protections.

Vulnerable groups

Participants highlighted several groups who are particularly vulnerable to the affordability-adequacy trade-off:

- *Families* – Neither market nor nonmarket stock have adequate capacity for large and/or multigenerational families. This leads to overcrowding which puts families at risk of eviction. On the nonmarket side, there is rigid adherence to occupancy standards, but no parallel provision of larger units. We need more 3+ bedroom units with some at ground level for accessibility.
- *Newcomers/immigrants* – Many participants described seeing racism and discrimination in the housing market, as well as landlords taking advantage of tenants who don’t speak English. Newcomers are also more likely to face the additional challenges of housing a large, multigenerational family.

- *Single mothers* – Those who are in a desperate situation will often take a 1 bedroom apartment with their children and live in overcrowded conditions.
- *Elders/seniors* – One participant has seen married couples divorce because of their pensions. It makes more sense and is more affordable for these elders to live separately, which leads to a host of other problems for them.
- *Youth/young adults* – There are not enough affordable suites for renters in this age group and it is becoming a normal pattern of life to move around often. One participant described the discrimination that young renters face in the intense competition for basement suites and noted that many may not know the RTA exists or know much about it.

Discrimination

In addition to discrimination faced by the vulnerable groups outlined above, participants noted that discrimination also occurs towards people with children and/or pets. It is difficult to prove discrimination in order to access protection, and the RTO has no jurisdiction to talk about human rights. The Human Rights Tribunal is better for this, but the process takes much longer. Even if discrimination is clear, people who are facing systemic barriers often will not go through the process to face the tribunal.

Conditions/maintenance

Mold, infestations and repairs that are not attended to are serious issues in both market and nonmarket housing. Battles with infestations and the costs associated with them negatively affect tenants' stress levels, their ability to sleep, and the health of their children. There is a lack of consistency around maintenance standards and, though the RTA says that landlords have to ensure housing is adequately maintained, many municipalities (eg. Surrey) do not have Standards of Maintenance bylaws to make sure it happens. Investment in property can be deducted from landlords' income tax.

Affordability from a landlord's perspective

Landlords are responsible for the enormous cost of treating pest infestation and reinfestation. Not all tenants (eg. someone with a brain injury) will register what they are told to do to prevent reinfestation. Landlords have to think about their own self-preservation. In a competitive situation, the ability to pay is a concern for landlords and even those who want to do good choose the easiest cases. If landlords are renting out a suite in their house, they are counting on that income. Things like the Rent Bank could help mediate this fear.

Landlord/tenant relationship – education and communication

Participants discussed the need for landlords to be educated beyond just seeing tenants as potential payments for their mortgage. Better communication is key, as well as guidelines for landlords in terms of the services and leadership they can provide to engage in more "human" work.

Additional issues

- Failure to address health issues in housing

- Right to smoke vs. right to live in smoke-free housing and ventilation concerns
- Inadequacy of income assistance
- Inadequate quantity and quality of food programs and food banks
- Harassment and exploitation of tenants by nonprofit housing providers
- Burden of rent increases
- Landlords charging illegal application fees
- Impacts of short term financial crises and launch of Vancouver Rent Bank this fall
- “Renovictions” of long-term renters
- The need for enforcement and consistency around illegal suites
- Going to the RTB is often not helpful and the process tells people who go through the system that there is no justice

Potential solutions

Participants were asked what they would like to do or see done to address housing affordability and adequacy. Responses included:

- Government interventions in the form of a National Housing Strategy, improved language in the RTA, enforcement of Standards of Maintenance
- Build more market and nonmarket rental stock
- Look for ways to improve the systems already in place by increasing accountability and setting in place minimum standards across the board
- Need to address co-op agreements
- Enforcement of RTB orders
- Train landlords in community development and make it an incentive for them
- Raise income assistance rates so that people can live with some kind of dignity
- Stop looking at housing as a speculative commodity
- Contain rent increases and allow tenants to gain interest on damage deposits

Table #5: Housing Conditions – Doug King

- Session #1: Didi Dufresne (First United Church)
Kim Bayer (BC Society of Transition Houses)
Alyssa Stryker (BC Civil Liberties Association)
Scott Clarke (Aboriginal Life in Vancouver Enhancement Society – ALIVE)
Corin Browne (community engaged artist)
- Session #2: Ivan Drury (DTES Neighbourhood Council)
Yuri Artibise (PlaceSpeak)
Arthur Paul (Native Courtworker and Counselling Association of BC)
Emma Lazo (Tenant Resource and Advisory Centre – TRAC)
Eugene Kung (BC Public Interest Advocacy Centre)
Stephanie Smith (MOSAIC)
Patrick Stewart (Aboriginal Homelessness Steering Committee)
- Session #3: Kalin Stoyanov (Vancouver Resource Society)
Andrew Sakamoto (Tenant Resource and Advisory Centre – TRAC)
Tom Laviolette (PHS Community Services Society)

Conditions and repairs

Poor conditions are pervasive, especially in the Downtown Eastside. Pest infestations in particular drive people crazy, affect their ability to sleep, and exacerbate other problems. Getting landlords to actually fix things is difficult, and often they are fixing things that are already inadequate (eg. fixing leaking sewage in an SRO with one bathroom per floor). Some landlords exploit tenants who don't speak English by refusing to make necessary repairs and expressing that they "don't care". Conditions are poor in nonmarket housing, often because buildings are aging and new ones are not being built.

Lack of funding

Nonmarket housing providers often inherit buildings with a history of neglect and are stuck doing band-aid repairs until they can get enough capital. Few government programs exist to help fund necessary work and programs, and those that do exist are very ad hoc.

Lack of enforcement

Participants felt there was a serious lack of enforcement on maintenance issues. Municipalities are not using the powers they have available to them. There is a Standards of Maintenance bylaw in place in Vancouver, but there is a lack of political will to take on landlords that is keeping people in threatening conditions. There was a push to stop negligent landlords after a house burned down on Pandora Street a few years ago, but that has since died down. Though the RTB has the power to levy fines against landlords, some participants feel that the fines are not likely to be enforced, but rather to be used more as leverage to get basic repairs done.

Renovictions

As Standards of Maintenance bylaws try to bring up the floor, we have “renovictions” in the middle. There is a major tension here as the floor comes up and increases cost pressures on landlords. They may be incentivized to do a little more and do renovictions. Another problem is the PR put out by the Apartment Owners Association about how bad the conditions of buildings are, which they use to support renovations and increased rents.

Design vs. behaviour

There are behavioural modifications that can help to mitigate problems, such as turning on fans when cooking or showering to help prevent mould. However, units should be designed for the way people live, rather than having to change peoples’ behaviour. This is a challenge from the perspective of builders as they always have to keep costs down and we don’t have a federal or provincial government that puts money into affordable housing.

Systemic change

In each of the three groups, participants felt that housing conditions could not be separated from larger issues that surround housing, and that systemic change is what is truly needed. Client-izing people into specific groups separates and makes it more difficult for people to achieve solidarity. Rather than having a home, people are “housed” in a system that treats them like moveable pieces in a puzzle. As long as it is like this and people are expected to be grateful for whatever they can get, nothing will change. There is also conceptual difference between seeing housing as an investment and as a home. It is important that we fight hard now for the idea that housing is a right and not something produced by the market to make some people rich. Tenants have a need for justice, not just repairs, as was exemplified in the tenant organization in the Wonder and Palace Hotels last year. Twelve claims were made against the landlord in court and injunctions were approved, but they have not been enacted or enforced by the City.

Client/actor relationship

The predominant system of action is advocacy and client-based and many participants supported the need for a shift in this thinking. This is especially pertinent for First Nations people. When service organizations treat First Nations people as “clients” rather than citizens, it is not any different than colonialism. Litigation as a strategy or solution may also perpetuate the client-based model.

Additional issues

- Difficulty in defining what is adequate
- People in nonmarket housing may be treated just as poorly as those in market housing
- Large, extended families face overcrowding and exploitation by landlords.
- Landlords should be expecting the costs necessary to keep a place liveable
- From a landlord’s perspective, they have a lot of requirements to meet
- The real tragedy is in Surrey—in basement suites
- The RTB is very under-staffed, which is bound to lead to poor judgement and little time for enforcing penalties

Possible Solutions

Participants were asked about their ideas on effective strategies and solutions to the issues surrounding housing conditions. Responses included:

- Community-based or citizen housing courts
- Education so people can become their own advocates
- Increase incomes so people can afford housing
- Increase supply of housing
- Get housing onto the NDP's platform in the upcoming provincial election
- First Call model – direct line to ombudsperson