

DELIVERED BY EMAIL

December 23, 2022

Curtis Ennis
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Director of Education
Halton District School Board

Tanya Rocha
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Vice Chair, Board of Trustees
Halton District School Board

Meredith Cammisuli
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Principal
Oakville Trafalgar High School

Dear Mr. Ennis, Ms. Rocha and Ms. Cammisuli:

Re: Halton District School Board (the “Board”), Oakville Trafalgar High School (“OTHS” or the “School”)

As you are aware, I am the solicitor for Mr. Scot Miller, Ms. Celina Close and Ms. Julia de Winter, parents of students at OTHS. I write further to my letter of December 19, 2022.

It is disappointing that the Board refused to even acknowledge our letter requesting dialogue.

I remind you that the Board is obliged to consult with parents, through school council.

The Board’s website explicitly provides that “appropriate dress policy” is a “mandatory area of consultation with school councils”.

Not only did the Board fail to meet that directive, but it had a Board representative, through Mr. Sari Taha, attend and interfere with a school council meeting by censoring parent questions about a dress code.

The Board will cease and desist from interfering with the function of school council.

Mr. Miller, co-chair of OTHS school council will be convening a meeting on **Friday January 13, 2023**, to address the matters outlined in my December 19th letter and pass a number of motions and resolutions to advance this matter. Members of the public will be invited to attend this meeting, as they are entitled to do pursuant to section 12(4) of Regulation 612/00.

Mr. Miller will prepare an agenda in relation to this meeting and it will be sent to Ms. Cammisuli on January 9th, 2023 for distribution to the parents. We note that pursuant to section 12(8) of Regulation 612/00, the principal is required to give written notice of the date and time of the location to all parents.

As a final matter, we ask that Ms. Cammisuli exercise her authority under Section 265 (1)(m) of the *Education Act* to exclude Ms. Lemieux from OTHS on an interim basis, until the Board has received school council's advice and recommendations. That section provides that it is a duty of the principal:

"subject to an appeal to the board, to refuse to admit to the school or classroom a person whose presence in the school or classroom would in the principal's judgment be detrimental to the physical or mental well-being of the pupils".

Given the intense public attention on this matter, the ongoing bomb threats and the obvious breaches of the student dress code that must apply to the teachers, Ms. Lemieux's attendance should be viewed as detrimental to the physical or mental well-being of the pupils. Insofar as Ms. Lemieux's attire is a breach of the student dress code, her conduct, and the Board's condonation of it, may be characterized as abusive and harmful to the mental well-being of the pupils.

If Ms. Lemieux is returning to teach at OTHS in the New Year, we expect you to advise us forthwith. Further, to advise of the basis on which the exercise of the principal's judgment pursuant to the above provision is not appropriate. Your failure to do so may be relied upon to address any personal and Board liability in respect of this matter.

We urge the Board to act appropriately.

Yours very truly,

BANDHU LAW PROFESSIONAL CORPORATION

Per: 

Rishi Bandhu

Copy to:

The Honourable Stephen Lecce, Minister of Education

Parents of Oakville Trafalgar High School