**Canadian Case Law Summary on "Reasonable" Corporal Punishment Prior to 2004**

Punishment causing bruises is not necessarily excessive --   
**R. v. Wheeler, Yukon, 1990**

Striking with a belt is perhaps a little distasteful but is authorized by law  
**R. v. L.A.K., Newfoundland, 1992**

Kicking and hitting an eight year old is well within the range of generally accepted punishment - mild compared to what I received as a child  
**R.v. K. (M), Manitoba, 1993**

Slap to head not per se excessive force  
**R. v. D.W., Alberta, 1995**

A hard body blow was necessary for a submissive response  
**R. v. Pickard, B.C., 1995**

Teenage Boy  
Took Mother’s Car w/out Permission  
Knocked-Off Bike, Punched, Kicked   
Swollen eyes and nose bleed  
Acquitted by Trial   
Reversed on Appeal – “trial judge erred in holding assault “reasonable”   
**R. v. Olsen, ON, 1990**

15 yr-old boy  
Talking in Class  
Pushed into desk by Hair  
Acquitted by Trial, Upheld on Appeal  
“Teacher’s action may be disgraceful, but it was not excessive”  
***R. Bouillon*, Que., 1993**

13 yr-old boy  
Talking in Shop Class  
Hit in head with hammer causing pain and bump  
Acquitted by Trial  
“Head injury benign, No Threat to health”  
***R. v. Swanson,* B.C. 1993**

13 yr-old boy  
Refused to kick ball in gym  
Grabbed by throat, hit on head with clip board  
Acquitted by Trial  
Teacher showed “incredible restraint”   
***R. v. Skidmore,* ON 2000**  
Instilling respect even through fear is acceptable  
***R. v. Wetmore*, New Brunswick, 1996 (teacher)**  
Raising welts does not amount to bodily harm  
***R. v. N.S.*, Ontario, 1999**  
  
Section 43 does not restrict discipline to what is appropriate or proportional or that it must be a last resort   
**R. v. Bell, Ontario, 2001**