

Just Before you Close the Book on Keegstra ... Does he Exist in Every Classroom?

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All teachers have emotions, indeed passions. However, a common assumption is that the biases of a teacher are left at the classroom door as he or she dons the mantle of neutrality. The realistic nature of this assumption bears investigation. The Keegstra case illustrates the potential impact of the role of teacher and, in this regard, rural Alberta is no different from the rest of Canada. It is vital to consider some of the factors which enabled such teaching to continue for so long. The issue here is how the power of the teacher's role can be abused with less attention, the extent to which reasoning processes in classroom investigations are sought, and the extent to which the authority figures of our children allow or encourage challenge. Far more work is required concerning how values can be handled in a classroom if such dogmatic teaching is to be prevented, and students are to be better equipped to deal with dogma when it does occur. The potential of such dogmatism must be acknowledged since to ignore it will not make it go away.

Tous les enseignants ont des émotions, en fait des passions. Cependant, une supposition commune est que les inclinations de l'enseignant sont laissées à la porte de la classe au moment où il ou elle revêt le manteau de la neutralité. La véracité de cette supposition mérite investigation. Le cas Keegstra illustre l'impact potentiel du rôle de l'enseignant et, à cet égard, l'Alberta rurale n'est pas différente du reste du Canada. Il est vital de considérer quelques uns des facteurs qui permettent à un tel enseignement de continuer pour si longtemps. La problématique ici vise comment le pouvoir émanant du rôle de l'enseignant peut être outrepassé sans la moindre attention, l'importance avec laquelle les processus dialectiques durant les enquêtes dans la salle de classe sont recherchés et l'ampleur avec laquelle les figures autoritaires de nos enfants permettent ou encouragent la défiance. Beaucoup plus de travail est requis à propos du maniement des valeurs dans la salle de classe si un tel enseignement dogmatique doit être empêché, et les étudiants devraient être mieux préparés à être confrontés au dogme lorsqu'il se présente. Le potentiel d'un tel dogmatisme doit être reconnu, l'ignorer ne le fera pas disparaître.

My friend's school is currently seeking to address the fact that they score well below the local average in survey questions asking about the accessibility and approachability of teachers. A typical response from individual teachers is to implicitly criticize the teacher down the hall, while feeling complacently smug about one's own professional relationships. Such response reminds me of the James Keegstra case.

As the legal consequences of this case appear to be finally drawing to a close, certain parallels can be made. Once all the elements of this case came to light, Keegstra's classroom conduct provided a fairly clear-cut target for condemnation. Yet, within the process of teachers condemning and expressing amazement that such a situation could ever have occurred, there can exist a self-satisfaction that one's own teaching exists upon a more exalted plane. The question remains whether the case has provided too easy a target for criticism and a vehicle for unmerited self-congratulation. I am struck by the question: To what extent do many of the ingredients continue unabated? The potential implications of complacency warrant more investigation than simply waiting for next year's survey results to see if any improvements have been attained.

I was initially attracted to the Keegstra affair by its exposure of the power of a teacher going unchecked by conventional restraints. A traditional assumption of public education was that children of different sexes, classes, cultures, races, and attitudes may enter a classroom together and benefit from the shared experience. The teacher plays a pivotal role in such an experience. In some magical way he is able to find a middle path among the diversity, treading neatly around possible conflicts and engendering a tolerance if not consensus. Yet, here was a Canadian teacher who lost his job when it was revealed that he had been promoting the Jewish conspiracy theory in his social studies classes for more than a decade. Today most people dismiss the case as an anomaly. This is a dangerous assumption. Keegstra represents an extreme illustration of a more ubiquitous problem. There has been a variety of repercussions from the attention given to this case, but the role of a teacher in grappling with values and the ability of students to deal with expressions of dogmatism present issues which have not been resolved adequately.

Educational changes in the 1970s encouraged the process of students making informed value judgments, with the teacher in the role of debate facilitator providing fair presentation of alternative views in order to stimulate independent thought in students. This partly reflects optimistic analyses (e.g., Lipset, 1985, p. 287) identifying improvements in education

as contributing towards a healthy pluralism in society. This optimism may have been shaken in Canada by the Keegstra case, but it does not seem to have been undermined. It is less comforting to accept the pessimistic view that Keegstra represents the tip of an iceberg of routine abuse of the power of a teacher. How often are students encouraged to question, in more than a token manner, the content of the teaching they receive? How much blind adherence to the word of a teacher is implicitly allowed: this being the antithesis of critical thought with interpretation becoming a ritualistic exercise. As Barrow says, "the dogmatist approach is non-think. It is a crude, untesting and soporific procedure" (1988, p. 158).

The ingredients of critical thinking need to be more systematically developed in the classroom, perhaps from early grades. Even at the university level, Blair wonders:

Are we confident that if our students were to consider a social policy issue which invites strong commitments – such as affirmative action, native rights, censorship or abortion – they could approach it in an open-minded way, seek out and treat fairly the arguments on different sides, prevent themselves from misrepresenting the positions they find themselves hostile to, resist the temptation to oversimplify and to see the opposition as evil? (1986, p. 162)

He outlines some proposals for such practice, warning that if such skills continue to be seen as an additional, not integral, task, we risk the type of miseducation experienced by Keegstra's students. The potential threat posed by sincere but misguided teachers has been long underestimated. As Hare comments, "if schools developed students' critical ability, and discouraged deferential acceptance, learners would not be so vulnerable" (1990, p. 381). The back-to-basics movement provides one illustration of teachers and parents who define effective teaching in terms of the orderly and disciplined nature of a classroom, an implicit assumption is that this is worthy of attaining even at the cost of students becoming soporific rule-followers. Such a notion requires appraisal.

More substantive progress would seem necessary if society is to prevent such dogmatic teaching from becoming the tip of an iceberg. Social studies' manuals cheerfully described the need for the development of independent thought by students, while Keegstra promoted a theory which prevented any such thought. Furthermore, one of the most unsettling factors is that Keegstra propounded his dogma to varying degrees between 1968 and 1982. He was ultimately dismissed and prosecuted under legislation concerning willful promotion of hatred against an identifiable group. However, to treat this as

the end of the story would be to have learned nothing from the whole situation.

Factors That Facilitated Keegstra's Impact

Factor 1: A lack of specialist knowledge. Keegstra joined a small staff all of whom taught a range of subjects; he initially taught Automotives and Industrial Arts, but ended up teaching many of the social studies classes. Bercuson & Wertheimer (1985, p. 17) describe how he wished to offset the socialist slant which he believed students had received in earlier grades; he maintained that his own resources were more reliable than the standard textbooks. It is a surprise only to people outside education that many teachers conduct lessons in fields other than their subject-specialties.

Factor 2: The appeal of a clear-cut philosophy. To Keegstra something is either a truth or an untruth; Jews were non-Christian and were therefore anti-Christian. He steered his students away from the world of competing interpretations and theories. History became systematic and unambiguous, with a single explanation for all major political and economic events in the last two centuries. Jews were blamed for wars, revolutions, economic depressions, and the moral degeneration in modern society illustrated by pornography and divorce (Lee, 1985, p. 44). Keegstra did the thinking for his students. He may have prefaced his remarks that conspiracy theories were not widely accepted, but he passionately affirmed his personal conviction in their accuracy on the basis of his own research, and he shared this research with his students. Without any contrary sources or views, most students accepted such information as fact. Consider the attraction of a student with average intelligence of a clear-cut philosophy being expounded by a respected teacher.

Factor 3: Teacher power. Students who were sceptical were faced with the reality of teacher-awarded grades; those who did independent research or who espoused different ideas were sometimes penalized (see the student essay in Mertle & Ward, 1985, pp. 5-8). The senior high student is perhaps caught between the belief in the importance of pleasing the instructor in order to attain a high grade – exhibited at the post-secondary level – and what Jules Henry (1968) calls a mechanism of docility whereby a teacher is able to obtain the answers he wants. The latter is based around a matrix of cultural values, as well as the dependency needs of children seeking to “bask in the sun of the teacher's acceptance” (Henry, 1968, p. 318).

Factor 4: Teacher authority. There were some complaints during the 1970s – especially from Catholics who were portrayed as the dupes of the Jews – but nothing was done. Keegstra was a formidable person to challenge. He was a popular teacher, perceived as being hard-working and giving interesting classes. He coached sport and assisted with car repairs, thereby gaining the loyalty of many male students. He was respected as a regular church-goer, becoming a deacon and Sunday School teacher at the nearby Diamond Valley Full Gospel Church. He was popular within Eckville, having been elected to the town council in 1974 and becoming mayor in 1980 (Bercuson & Wertheimer, 1985, p. 18). With such a broad range of support most people seemed prepared to dismiss stories of his weird ideas as challenging young people to think. Therefore, a further significant ingredient was the intimidation felt by parents and/or their children about registering a complaint concerning lesson content.

Factor 5: Parent apathy. Those who noticed the one-sided theme seemed to have had their concerns muted by apathy or the urge to conform. Those who did question would be confronted by a teacher with a degree and an unshakable belief in what he was doing, backed up by the school principal who extolled Keegstra's virtues as a good disciplinarian (see Bercuson & Wertheimer, 1985, pp. 69-73 for information on Lindberg and Olsen, the two Eckville principals during Keegstra's employment). Furthermore, others in the community supported the doctrine preached in Keegstra's classroom. It is unlikely that he would have escaped notice for so long had he been espousing communism. Typically parents pay only scant attention to the specific content of their children's work.

Factor 6: Closing ranks. The various agencies around Keegstra seemed almost dumbfounded when confronted with his unapologetic conviction. His principal appeared not to know what was going on in his own school, or simply did not want to make a fuss. Over the years two of the superintendents clearly underestimated the extent of Keegstra's determination, optimistically assuming that positive change would occur. Previous Boards of Education displayed little knowledge of history. Certain trustees appeared more concerned with Keegstra's lack of decorum than with the content of his teaching. Furthermore, the Alberta Teachers' Association representative appeared to have disregarded the evidence in front of him in characterizing one parent's complaint as harassment of Keegstra. At least initially, these authorities effectively closed ranks in their protection of a teacher: "Principal, superintendent, Board, and ATA all failed to understand what was

going on in Eckville. And through that deficiency all failed a lot of Eckville children who deserved a whole lot better" (Hodson, 1984, p. 17).

One does not have to look far to find nonspecialists teaching a subject, or teachers who imprint their own individual style upon a subject, or teachers who believe that their stance on a topic is superior to alternatives. It is not hard to identify impressionable students looking up to a teacher holding a strong belief, or indifferent students anxious to pass a course. Equally, many parents believe that the teacher is always right, or will be reluctant to oppose such a community figure. The Malcolm Ross Inquiry presents a further example of the reluctance of various educational agencies to take action against a teacher (Bruce, 1991, pp. 56-63). These factors are almost ubiquitous. Their existence does not mean that classrooms are seedbeds of bias since these factors need not undermine the educational process. However, the pervasiveness of these elements does call into question the taken-for-granted role of teacher as officially prescribed mediator of the curriculum.

The legal fact is that teachers are employees with work governed by a legal contract of employment and curriculum guides; therefore they should not be able to preach whatever they happen to believe to be true, or so conventional wisdom regarding the teacher's role would suggest. What requires far more attention is the extent to which teachers routinely impose their own view of the world, and the legitimacy of the curricular selections they make. The scholarly literature and media attention of the Keegstra case have tended to focus on the bizarre aspects. The position suggested here is that many of the aspects of his teaching are disturbingly familiar. In the words of a teacher in a Christian alternative program:

Every teacher, whether they admit it or not, has a value perspective. If the teacher believes strongly in environmental causes or global peace, that teacher will bring that perspective into the classroom. In this particular program our values are explicit, in many others they are slipped in the side The biggest difference I find as a teacher in this program is that for the first time I can be explicit about the values I hold. (Keith Dargatz, Vice-Principal of Eldorado School, Drayton Valley interviewed in Sweet, 1996)

While teachers believing in a Jewish conspiracy theory may be dwindling, the same would not be true for pro-life/choice (although such issues are not of equal value). Moreover, such factors are not restricted to social studies: the potential for promoting or opposing, say, sexism exists in every classroom.

Is Classroom Neutrality Achievable?

Neutrality tends to be assumed by the majority of groups in education as the appropriate professional behaviour towards most issues. The role of nonpartisan referee avoids any accusations of indoctrination, and equal restriction on all teachers from expressing personal views provides one insurance against dogmatism in the classroom. But, is this more like a tribute to Mr. Chips? While it is possible to partially illustrate the general notion of a detached teacher rising above subjective preferences, it does seem divorced from everyday classroom reality. In her book about teacher education, Britzman (1991) examines the fundamental validity of this assumption. She comments that one's views about objectivity and subjectivity have considerable bearing on how one thinks of a teacher's identity:

The repressive model expects teachers to shed their subjectivity and assume an objective persona. Here the teacher's identity and the teacher's role are synonymous. The lived tension, however, is that they are not. Role concerns functions, whereas identity presupposes investments. While functions can be bestowed, identity cannot. (Britzman, 1991, p. 25)

Perhaps classroom reality is more closely represented by teachers nursing individual prejudices and hang-ups confronting students who are busy constructing their own prejudices and hang-ups from the role models around them. It is worth noting how Barrett (1987) portrays the role models for many of Keegstra's students as solid, God-fearing, law-abiding citizens: the backbone of a community typical of many throughout Canada. From this perspective, racism is not the preserve of the poorly educated :

Much more numerous are those who can be described as solidly middle-class: reasonably well-educated, often well-travelled, intelligent and thoughtful, but racists none the less. In other words, these people are not so different from the average Canadian citizen. (Barrett, 1987, p.vii)

In assessing what degree of balance is attainable by a teacher, a knee-jerk response is the complete avoidance of anything controversial. However, teachers act in value-infused settings where the attempt to exclude political issues would imply that schoolwork has little relationship to concerns within a community, and would engender more intellectually sterile, alienating classrooms. Protecting students from thorny issues seems to suggest a cosy naivete that everything in the classroom is rosy, a stance difficult to sustain even in Grade One. The answer does not lie in the direction of limiting teaching to a carefully specified list of appropriate topics. Acceptance of this position would restrict freedom of speech to the ideas with which we agree. As June Callwood stated:

The freedom of speech which we must protect is the freedom of speech with which we explicitly, emphatically, categorically disagree. By safeguarding the freedom of loathsome, even hurtful, speech, we ensure first of all that society cannot be blind to the existence of vile attitudes and heinous beliefs. (cited in Fotheringham, 1993)

It is debatable whether such a stance is gaining or losing converts. Furthermore, while Ms. Callwood may be convincing, many of those accepting her general philosophical position will draw the line when it comes to the classroom.

Consider the implications of inviting Mr. Keegstra to take time off from his mechanic's job in Eckville to give a talk to a Grade 12 Social Studies class. This would provide a forum to views which many would find distasteful and offensive. (This occurred in a Red Deer high school, a move which has been condemned by the League for Human Rights for B'Nai Brith Canada. See Toneguzzi, 1995.) Parents would have to be informed prior to the event, and would rightly have questions. The school principal would be urging the teacher not to rock the boat; while, given its recent involvement, the ATA might be unwilling to give its support. Most teachers would see the whole exercise as not worth the inevitable amount of hassle. Nevertheless, as long as a considerable degree of care was taken to ensure that the event was indeed educative, such an approach would be far more intellectually honest than pretending such views do not exist, or only mentioning them in passing. It will be objected that the vulnerable minds of the young should be spared the polar ends of the spectrum: surely the temperate middle ground is the tried and tested stuff of education? What such a stance fails to consider is whether these minds are mature enough to cope with controversy, and whether it is desirable that students be cocooned from some of the harsher realities of life until they leave school. (For an excellent exploration of classroom political debate, including the Keegstra case, see Fine, 1993.)

Considerable danger lies in an alternative reaction to the issue of classroom neutrality, which is perhaps more widely adopted than most people would care to realize: the presentation of certain values in the absence of effective competing points of view. Even where there is the impression of open debate, a more subtle scenario can be employed, either consciously and unconsciously. For example, a teacher could select a popular and articulate student to represent the position he or she favours, while choosing a less popular and less able student to propose the alternative. Within such scenarios Keegstra-type elements can be identified as existing well beyond Eckville. Imagine a continuum from an impartial teacher energetically pursuing competing points of view, to the dogmatist energetically restricting

the range of acceptable argument: where does the bulk of common practice lie? Most teachers operate within professional guidelines, but they are human. In exercising discretion they may find it hard to resist emphasizing materials favourable to a personally-held perspective, then praising students who respond appropriately.

A different view is that students neither absorb information uncritically like sponges nor question everything. Rather, their value formation results from complex interactions among influences of home, media, and peers – which in a pluralist society will conflict with one another. In such a context, the influence of a teacher holding specific views is often exaggerated. Also, avoidance of teacher opinion might deny students potentially informative perspectives, as well as suggesting that the subject is not that important. The student is unlikely to risk personal vulnerability by arguing an emotional topic when the teacher seeks to remain detached: this situation is not conducive to lively, engaged discussion. Therefore, a pretence of neutrality would seem to be a straitjacket, preventing any topic having anything more than academic impact.

When Keegstra claimed unreasonable dismissal, an ATA lawyer argued that dismissal represented a violation of the right to express opinions in the classroom (Kirman, 1986). Yet, the classroom cannot provide a soapbox for dogmatism, so a far clearer notion of professional responsibility seems essential. Periodic increases in political activism by teachers, for example in the area of global education, suggest that a growing number wish to facilitate the soundness of students' reasoning on moral issues, and then push to stimulate a lived commitment. This position is defended by Burnley who writes:

Human rights education is geopolitical education. It encourages critical awareness of our world, an awareness that we should be pleased our children have the chance to obtain. And political illiteracy is of no value in a democracy. Human rights awareness is not a form of subversion. It is a legitimate part of everyone's education. (Burnley, 1986, p. 79)

As a public servant, the teacher can be held responsible for his actions, but he can equally make a case for having an obligation to express a viewpoint. This case can be seen to minimize manipulation or misinterpretation since it allows a student to recognize a model of advocacy, to understand the motivation which inspired it, and to assess the balance of ideas within it. In this approach, teachers are required to sow the seeds of on-going dialogue which enable students to develop informed convictions. As Kelly puts it, "disclosure rather than silence is the more educative pedagogic position"

(1986, p. 130). Thus, a teacher being open about his or her views seems to have much to offer as an approach to controversial issues. The teacher may decide the initiation, timing, and tone as appropriate to the specific classroom context; but, this need not amount to propaganda, as it would if there were repeated efforts to convince students of the superiority of one's own stance. While Keegstra is an example of the latter, not all cases of teacher disclosure violate impartiality.

The choice need not be between an anything-goes type of permissiveness and a meticulously edited sanitation. It is perhaps a matter of where to draw the line, but such line-drawing needs to be made more decisively, and the decision should rest upon recognized and justified grounds. It is easier to pose such questions than to offer solutions to them. But, in too many cases the political and cultural status quo is perpetuated in an unquestioned way as a result of such factors as the socio-economic background of teachers, the constraining impact of traditional curriculum, desire for promotion, teaching as one was taught, and the desire to appease parental (and often student) expectations. Indeed, those teachers breaking out of this mould are criticized both for the values they do transmit and those they do not.

The Aftermath of Keegstra

In September 1994, the Alberta Court of Appeal struck down the second attempt to convict Keegstra and debate began over the rights and wrongs of a third prosecution. (The essence of this debate is illustrated in the *Edmonton Journal* Editorial, 1994, p. A16, and Ford, 1994, p. C3.) Implementation of the hate laws has been shown to be erratic and contentious (see appendix A), and such muddled responses are paralleled in education. If you ask an emotional, controversial question of people involved at various levels of education, from classroom teacher to Education Minister, you will often receive a carefully-worded, neutral response; these are, after all, politically sensitive times! The desirability of such mental qualities as openness of mind, and a critical capacity is given extensive lip service yet little effective stimulation. Part of the fear of approaching issues which are political, in the broadest sense of the word, can be attributed to concerns about accusations of teachers preaching or even being subversive. A social studies friend hesitates before introducing material critical of the logging industry in Alberta because of the number of families whose living depends upon such industry. One result of the extension of such fear is that students become educated into a state of political illiteracy.

The case of James Keegstra illustrates a dangerous potential within the role of a teacher, that could be more widely realized unless tackled more directly. He taught extreme ideas to a class which did not recognize the dogmatic content. Since Keegstra's dismissal, teacher evaluation has become more systematic, and new versions of the social studies curriculum have become more explicit in their requirements, but the topic of values in the classroom is far from being passé. One Eckville teacher mentioned a former member of staff who had advocated very liberal views towards sex, pornography, and drugs. She complained that Keegstra got fired as posing a threat to students and asked, who next? The answer is not to instigate a witch-hunt against those daring to express an opinion; rather it lies in a clear analysis of the professional limits of a teacher's autonomy (see Bruce, 1991, p. 47 for consideration of the impact of off-duty conduct on a teacher's assigned duties).

One scenario is that a teacher regularly making favourable mention of the Reform Party platform would receive only mild questioning, in contrast with a cold war response likely to be received by a colleague extolling the virtues of socialism. Political context is clearly significant, but a worrying conclusion is that what inspires only limited protest may well be regarded as within the limits of acceptability. Schools need to do better. Much has been written about the avoidance of subjective influences in one's teaching, but without more specific reflection by practitioners and newcomers to the profession, the teacher's desk will continue to hold the potential for being more than an administration centre, even if it does not go to the Keegstra extreme of soapbox for personal convictions. Distinction is needed between unavoidable aspects of the hidden curriculum, and the consistent promotion of personal bias. There is food for thought within the humorous definition of hidden curriculum: that there are two points of view – mine and the wrong one!

The question remains whether teachers are prepared to deal effectively with expressions of bigotry in their classrooms, or do they typically respond with clumsy and vague notions of value consensus? Equally, are students prepared to deal with expressions of bigotry from their teacher? Doubts about both situations do not make a healthy combination. In May 1994, the German parliament passed a law making it illegal to deny the murder of more than 6,000,000 Jews by the Nazis (Evans, 1994, p. D2). Although the law was subsequently rescinded, this route of leadership-by-legislation cannot be the way forward for education. Teachers' values present an ideological minefield which requires direct address at the classroom level, not simply academic dialogue. Too many teachers seem content to view themselves as

commendably impartial; Keegstra would probably have been among them. The answer does not lie in attempting to muzzle teachers seeking to make a difference and have impact on their students (this often occurs whether sought or not); rather, teachers could acknowledge the blatant reality of their possession of personal opinions and go from there.

More must be done in my friend's school to encourage all of the teachers to look at their own practice more critically in order to see how their actions have impact upon student perceptions. On a broader level, more recognition must be given to the power within the role of the teacher, and how this can be exercised in judicious ways. As far as values are concerned, it seems more productive to move towards disclosure, as long as this occurs in an atmosphere which encourages challenge and is not exclusive. This will avoid partisanship (whether extreme and explicit, or mild and subtle) and will accord more genuine respect to the autonomous thinking of students. Also, more must be done to examine the factors that contributed to the protracted situation in Eckville, and determine ways in which some of the elements can be modified for educational benefit. Otherwise we will not have learnt sufficiently from the whole experience, and society will deserve and will undoubtedly receive more Keegstras.

Appendix A: Chronology of James Keegstra

1934	Born last of seven children of Dutch immigrant parents who were fundamentalist Protestants and loyal Social Creditors.
1968	Obtained a permanent job at Eckville High School initially teaching Industrial Arts, then increasing amounts of Social Studies.
Dec. 1981	Lacombe Superintendent investigated a parent's complaint about content of lessons.
Feb. 1982	Board of Education hearing – directives issued to stick to the curriculum.
May 1982	Petition protesting anti-Jewish/Black/Catholic content of his classes. Deputy Superintendent visited and reported on Keegstra's impressive class control.
Oct. 1982	Parental complaint showed Keegstra had not changed the content of his lessons.
Dec. 1982	Fired by Lacombe County Board of Education.
March 1983	Board of Reference upheld this dismissal.

June 1984	Charged with violating "anti-hate" section of the Criminal Code.
July 1985	Trial found him guilty.
July 1988	Verdict overturned by Alberta's Court of Appeal since hate laws violated Charter of Rights and Freedoms.
August 1988	Alberta government announced its appeal.
Dec. 1990	Supreme Court of Canada ruled that provisions against hatred in the Criminal Code were justified in a democracy.
March 1991	Alberta's Court of Appeal quashed his conviction as Keegstra did not have the chance to challenge the impartiality of his jurors.
July 1992	Retrial convicted Keegstra.
Sept. 7, 1994	Alberta Court of Appeal ruled that second conviction also be overturned as the trial judge failed to respond to the jury's request for transcripts of testimonies and for help understanding the Criminal Code.
Sept. 22, 1994	Alberta's justice minister announces that the case will return to the Supreme Court.
May 18, 1995	Supreme Court of Canada rejected a full constitutional challenge to the hate laws, but allowed Keegstra to argue that the law creates a "reverse onus" which violates the constitutional right to be presumed innocent.
Feb. 8, 1996	Supreme Court of Canada restored Keegstra's conviction, and affirmed that Canada's hate law is constitutional.

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