

ment inapplicable to the infliction of corporal punishment upon schoolchildren for disciplinary purposes, the Court explained that the Cruel and Unusual Punishments Clause “circumscribes the criminal process in three ways: First, it limits the kinds of punishment that can be imposed on those convicted of crimes; second, it proscribes punishment grossly disproportionate to the severity of the crime; and third, it imposes substantive limits on what can be made criminal and punished as such.”²⁶³ These limitations, the Court thought, should not be extended outside the criminal process.

²⁶³ *Ingraham v. Wright*, 430 U.S. 651, 667 (1977) (citations omitted). Constitutional restraint on school discipline, the Court ruled, is to be found in the Due Process Clause, if at all.