The Hidden Curriculum of Street Law

Mahum Shahzad Laun*

Abstract

This paper discusses the program of Street Law through the lens of the hidden curriculum. It posits that the traditional educational system is structured in a way that results in negative impacts through its hidden curriculum; students often end up learning obedience to authority, repression of speech, racial, and gender discrimination as well as class inequality. It seeks to prove that the replacement of the traditional system with a system of democratic education, such as the Street Law program, that focuses on conceptual development will result in the hidden curriculum being used for a positive change. The paper discusses the Street Law program and its interactive teaching methodology and seeks to identify the positive impacts of its hidden curriculum for law students and their learners.

Keywords: street law, hidden curriculum, traditional system of education, teaching methodology

Introduction

This paper identifies the trend of dwindling democratic ideals in society through a critique of traditional educational systems. It highlights that the hidden curriculum (such as the environment) of traditional school systems has negative effects on their recipients and has hindered the development of democratic ideals. The paper suggests modifying teaching methodologies and using the hidden curriculum for a positive change. A reformation of the educational systems based on conceptual development and student-centered learning will result in students that are more informed and espouse democratic values.

The article establishes this through discussing the Street Law teaching program in a law school setting. Street Law provides readers with

* B.A LL.B (Hons), LUMS.
an insight into the relationship between the law, education, and democracy. It uses learner-centric teaching methodologies to help future lawyers develop various interpersonal skills required in professional life while also helping the general population in civic education. The article traces the benefits of the hidden curriculum of Street Law for both law students and their learners.

This paper is divided into five sections. Part I discusses what a hidden curriculum is and how traditional schooling systems have resulted in the transmission of negative attitudes, norms, and behaviours to its students. It argues that a hidden curriculum is a powerful tool that can also be used to create a positive change in society. Part II focuses on the Street Law program and how it functions with an emphasis on democratic education. Part III identifies the benefits of the hidden curriculum for law students, whereas Part IV identifies the benefits gained by the learners. Lastly, Part V concludes the paper.

**Part I: The Hidden Curriculum**

A hidden curriculum refers to the implicit curriculum of attitudes, knowledge, and behaviours that are imparted to students often unintentionally by actions, words, and atmosphere that form a regular part of the academic setting.\(^1\) The term was coined by Philip Jackson, a scholar of education, and constitutes the impact that results from the unofficial rules, routines, and regulations within a learning environment.\(^2\) Hence, the learning that results from a particular structure of the classroom is the hidden curriculum, whereas the learning that is intended by the teachers in a particular academic setting such as concepts of mathematics or a language is the proper curriculum.\(^3\) This theory of education was expounded by John Dewey, who stated that “collateral learning in the way of formation of enduring attitudes, of likes and dislikes, may be and often is more important. ... For these attitudes are fundamentally what count[s]..."

---

3 Jane R. Martin, ‘What Should We Do with a Hidden Curriculum When We Find One?’ (1976) 6 (2) *Curriculum Inquiry* 135, 137.
in the future.” He argued that the way a particular learning environment is structured is extremely significant; how the environment treats the individual and what the individual is allowed to do or not do is essentially what the individual learns. He emphasised that the medium (the environment) is the message itself, as it insists or encourages individuals to learn particular perceptions, behaviours, and values. The lessons learnt from the hidden curriculum encompass a wide scope of learning, including attitudinal, emotional, moral, and social learning. Thus, the hidden curriculum is a powerful tool and has often been held responsible for imparting particular values or promoting certain behaviours, standards or social beliefs among students.

The traditional educational system has often been criticised for imparting a negative influence through its hidden curriculum. Researchers have established how the hidden curriculum in classrooms transmits lessons which perpetuate social inequalities, racism or traditional gender roles. Research studies from the 1980s show how academic and vocational training at the time was organised with a structure that socialised racial minorities and females into “positions of powerlessness, or …channelled into low-status work roles.” The reason for this was that traditional educational systems placed greater emphasis on the proper curriculum as compared to the lessons learnt from the practices, rules, relationships and physical characteristics which constitute the structure of a particular academic setting. Traditional classrooms follow a strictly hierarchical structure where respect for authority is an ingrained principle. Students are expected to respect the authority of the teachers and the administrators, and the teachers are expected to respect the authority of the

---

5 Ibid, 280.
6 Ibid, 279.
8 (n 2) 2.
9 Ibid.
10 Ibid.
11 (n 3) 137.
administrators.\textsuperscript{12} This authority is often coupled with control and the inability to tolerate any dissent. A typical example includes how a dissenting student expression is often deemed to dismantle the hierarchical authority of administrators and teachers and is often punished.\textsuperscript{13} Hence, traditional schools often follow a social structure that requires students to tacitly learn obedience to authority as part of the hidden curriculum.\textsuperscript{14} While traditional schooling systems boast the promotion of democratic values such as civility, in reality they are involved in anti-democratic practices, including the suppression of the right to freedom of speech.\textsuperscript{15}

However, the impact of a hidden curriculum does not always have to be negative. It is a tool that can be used for creating positive change in schools and the society at large.\textsuperscript{16} Educational scholars propose that the structure of traditional schools be replaced with a model of democratic education focused on conceptual development.\textsuperscript{17} The core difference between the traditional and the new model is the capacity to allow student expression.\textsuperscript{18}

Abraham Lincoln observed that “the philosophy of the schoolroom in one generation will be the philosophy of the government in the next.”\textsuperscript{19} The same ideology is mirrored in Dewey’s impactful philosophy of democratic education. He stated:

\begin{quote}
The conventional type of education which trains children to docility and obedience, to the careful performance of imposed tasks because they are imposed, regardless of where they lead, is suited to an autocratic society... But in a democracy [these traits] interfere with the successful conduct of society and [the] government... If we train our children to take orders, to do things simply because they
\end{quote}

\begin{footnotesize}
\textsuperscript{13} Ibid, 1308.
\textsuperscript{14} (n 4) 281.
\textsuperscript{15} (n 12) 1309.
\textsuperscript{16} (n 7) 125.
\textsuperscript{17} (n 12) 1309.
\textsuperscript{18} Ibid, 1318.
\end{footnotesize}
are told to [do so], and fail to give them the confidence to act and think for themselves, we are putting an almost insurmountable obstacle in the way of overcoming the present defects of our system and of establishing the truth of democratic ideals... Children in school must be allowed freedom so that they will know what its use means when they become the controlling body, and they must be allowed to develop active qualities of initiative, independence, and resourcefulness before the abuses and failures of democracy will disappear.\textsuperscript{20}

Amy Gutmann further expounds this theory in her book, Democratic Education, where she argues that a democratic education system should provide students with an environment that inculcates critical thinking skills in them and prepares them for making decisions in a rational and deliberate manner so that they may effectively participate in a democratic political life.\textsuperscript{21} The environment is part of the hidden curriculum and can be used for creating a system of positive change in society. This can be done by following a model of democratic education that teaches students the value of justice, respect, tolerance, and civic engagement. This paper suggests introducing the Street Law program at different law schools in the country to help achieve these values.

\textbf{Part II: Street Law}

Street Law is a model of education that makes deliberate use of the hidden curriculum in order to create a positive impact on its participants. It started as an interactive law school program over 40 years ago. It places law students in high schools, prisons, labour unions, and other settings to teach their students (who will now be referred to as ‘learners’) about the law and the government, and their interaction with both.\textsuperscript{22}

Street Law emerged out of a backdrop of law students that entered the legal field without the requisite skills for professional life, dwindling civic knowledge, and participation in society. Law schools in certain countries had slowly removed the practical aspect of legal education, such as

\footnotesize
\textsuperscript{20} (n 12) 1312.
\textsuperscript{21} Ibid, 1313.
\textsuperscript{22} (n 19) 1.
apprenticeships and created a heavy emphasis on pure academic learning. This shift in the legal curriculum resulted in lawyers that “seem[ed] to know too much law and too little human nature”\textsuperscript{23} Thus, there was a need for the training of law students to include experiences with the ‘real world’ and develop the necessary ‘lawyering’ skills required for the legal field. In addition to law, students’ lack of engagement with the common man and a deficiency in civic knowledge necessitated the Street Law Program. A study by the US Office of Education concluded that a quarter of the adult population of the USA was ‘functionally incompetent with respect to their legal rights’.\textsuperscript{24}

Street Law, thus, is a democratic form of education that seeks to educate communities with regards to civics while incorporating democratic values within them through the hidden curriculum. It has now evolved into a global curriculum that is used in various forms, including in-school programs and NGO activities all over the world. It follows different structures or models; it can either be a credited course within the law school, sponsored or done on a voluntary basis by law school students.\textsuperscript{25} Their law faculty oversees the program, and practising attorneys often give seminars covering areas of law in which they have particular expertise.\textsuperscript{26} The students that are part of the program put in extensive hours of work, including attending seminars on particular legal topics, planning for lessons, and teaching their learners a few hours per week. The program emphasises creating an environment which is conducive to the learning of these values by having extensive role-playing exercises, mock trials, court observations, and other student-centered

\textsuperscript{23} John S. Bradway, ‘Education for Law Practice: Law Students Can Be Given Clinical Experience’ (1948) 34 (2) \textit{American Bar Association Journal} 103.


\textsuperscript{25} Interview with Richard L. Roe, Adjunct Professor of Law, Georgetown Law, George University (Washington, D.C., United States, 22nd April 2018). Professor Roe is the Director of the Law Center's D.C. Street Law Project and specializes in educating the public about the law. The interview revolved around his extensive experience with the Street Law program and the benefits it has for the parties involved.

activities. It also recognises that learners are from different socio-economic and cultural backgrounds, and ensures that the program does not further result in an unintended marginalization of some students; practising the democratic ideals, it teaches.28

The Street Law teaching methodology strongly reflects Max Van Manen’s ‘pedagogical tact’ and has an overarching theme of letting learning happen.29 It encapsulates the essential features of student inquiry and student discovery as the fundamental building blocks for every lesson and aims to maximise student engagement.30

The Shaikh Ahmad Hassan School of Law at LUMS undertook a pilot project of Street Law in Pakistan in 2017-2018. It functioned as a community outreach program and was done on a volunteer basis in contrast to the credit or paid model usually followed in other countries. A team of seven students was formed to undertake this project and a member of the faculty oversaw the program. The law students had to select high schools that offered free education and teach their respective high schools one hour per week. Additionally, they attended weekly seminars where they discussed future lessons as well as reflected on the lessons, they taught their learners. Students were expected to draft lesson plans before every class and research on the respective topics so that they are well-prepared for their classes. They taught in these schools for the entire academic year and conducted a political lobbying exercise at the end of the program with all the participating schools.

The law school continued on the same voluntary model in the academic year that followed (2018-2019) but made it a credited course in the coming academic year. It is recommended that law schools should offer this program as a credited course to its students in order to develop practical lawyering skills. Many law schools already offer legal aid clinics as credited courses in order to develop these essential skills, but that is often restricted to older students; Street Law can be offered to students in the earlier years of their academic career.

27 Ibid, 570.
28 (n 24) 1, 4.
29 (n 26).
30 (n 19) 13.
Part III: Hidden Curriculum for Law Students

Street law offers benefits for the law students not only in terms of its proper curriculum but also in the values and skills it teaches through its hidden curriculum. A hidden curriculum is not only restricted to purely academic learning environments but includes non-academic learning environments as well.\(^3\) Hence, the clinical education of the Street Law program also has a hidden curriculum that transmits lessons beyond those learnt via the curriculum proper. In preparation for the classes they have to teach, the law students go through extensive research and attend seminars to gain knowledge about the substantive content of the law; hence they learn about various fields and jurisdictions of law they might not have been exposed to through the formal education of their law school.

However, the Street Law program is designed to specifically use the hidden curriculum to provide law students with the requisite lawyering skills needed for success in the legal field. Traditionally, law school curriculum has tended to overlook these necessary skills, but Street Law enables the students to develop critical thinking, operational and interpersonal skills, self-reflective attitudes, autonomous learning abilities, and use of informed judgment. A law student who participated in the Street Law program at LUMS said that it helped him challenge conventional notions and his existing beliefs.\(^3\)

Upon stepping into a teaching role, law students are required to engage their learners with a learner-centric and a dynamic teaching methodology.\(^3\) They are required to be creative and create environments in their class that foster the discussion of ideas, student expression, and critical thinking.

The students, while delivering their lessons, not only understand the substantive content better themselves, but are also able to develop oral advocacy and communication skills as they have to deliver their complex lessons in a way that is easily understandable to their learners.\(^3\)

---

\(^3\) (n 3) 135.

\(^3\) Interview with Haris Irfan, LL.B student at SAHSOL, LUMS (Lahore, Pakistan, 23rd October 2018).

\(^3\) (n 25).

\(^3\) Ibid, 569.
student who participated in the program realized that teaching makes him understand the content better than he would otherwise have.\(^\text{35}\) The program advisor at the LUMS Street Law program said that she saw her law students transform into confident individuals, ‘They were unsure of themselves before, but in just a few sessions, they have come into their way of handling a classroom with interactive teaching.’\(^\text{36}\)

The content also encourages law students to work on thinking and reasoning clearly, which are essential skills for their practical work as a lawyer. Not only this, but the content also insists that students undertake a critical and reflective attitude towards moral and ethical values, as well as the legal system.\(^\text{37}\) Often, the law students, while designing lesson plans in their weekly seminars, would end up debating on critical issues such as the death penalty, the freedom of expression and protection of minorities themselves as well.

Participation in a Street Law program also prepares students to deal with the unexpected and to think on their feet as they have to answer questions that arise from their class. Additionally, they develop the ability to anticipate questions or issues that may arise out of a particular discussion and research for them beforehand.\(^\text{38}\)

In their preparation for teaching, the law students have to develop the ability to read a room and identify when their learners are distracted or confused and alter their teaching methodology or content to the peak and retain the interests of their learners; they learn to react in meaningful ways to learner responses.\(^\text{39}\) The Street Law program advisor at LUMS, Mirza, argues that her law students are better able to recreate lesson direction based on audience participation as compared to her or somebody who has not been through the process of teaching in the program.\(^\text{40}\)

These interpersonal skills that the law students develop are fundamental to their professional life. A law student who was a part of the

\(^{35}\) (n 32).
\(^{36}\) Interview with Angbeen Atif Mirza, Assistant Professor, SAHSOL, LUMS (Lahore, Pakistan, 22\(^\text{nd}\) October 2018).
\(^{37}\) (n 25) 569.
\(^{38}\) Ibid.
\(^{39}\) (n 26).
\(^{40}\) (n 36).
Street Law program at LUMS said that it helped her improve her organizational skills, including the ability to think creatively and effectively, and the ability to collaborate and delegate tasks to work towards a set goal.\textsuperscript{41} In addition to the lessons that law students teach, they often have to submit written lesson plans to their program coordinator and attend seminars on a weekly basis that helps them precisely plan out the cognitive, attitudinal, and skills objectives of their classes; hence they learn how to use the hidden curriculum in their classes.\textsuperscript{42} A Street Law program creates a sense of responsibility and participation in the community and may even guide many students towards a career in public service or pro-bono work. A student said, ‘Street Law has made me realize that I want to give back to society’ and pursue a career in teaching along with his legal practice in future.\textsuperscript{43} The law students thus become better communicators, effective lawyers, and more respectful members of the community.\textsuperscript{44}

Most students who participate in such a program say that it is either the most or one of the most enjoyable experiences at law school.\textsuperscript{45} Many alumni of this program who participated in the Street Law program at Georgetown University agree with and reflect on the skills that they learnt through this program. A student who participated in the program in 1981 and is now a Defence Attorney quotes, ‘Street Law got me out of my comfort zone’.\textsuperscript{46} Another student who is currently an international lawyer says that he learnt ‘the value of being treated fairly and generously’.\textsuperscript{47} On the 40\textsuperscript{th} anniversary of the Street Law program at Georgetown, Eleanor Roberts Lewis, quotes her favourite memory:

When I was a law student in the early 1970s, I worked ... to develop the first curriculum and teacher training materials for the Street Law Program. Several of us were former teachers, and it was wonderful to be able to combine our education and law

\textsuperscript{41} Interview with Rabia Zafar, LL.B student at SAHSOL, LUMS (Lahore, Pakistan, 25\textsuperscript{th} October 2018).
\textsuperscript{42} (n 25) 569.
\textsuperscript{43} (n 32).
\textsuperscript{44} (n 19) 3.
\textsuperscript{45} (n 25) 574.
\textsuperscript{46} (n 26).
\textsuperscript{47} Ibid.
backgrounds to bring these important subjects to high school students. Now I'm retired after 32 years of practising law; I’ve been volunteering at Thurgood Marshall Academy, a law-themed public charter high school in Anacostia founded by law students and faculty in the Street Law Program. A true ‘full circle’.\(^48\)

In an interview, Professor Roe of the Street Law program at Georgetown University fondly quotes an incident with one of his students whom he remembers to be very shy and reserved. She was faced with an interruption in her class by the Principal of the High School where she taught, in which he called out a student without any regard for the ongoing Street Law class. The law student who was teaching the class stood up for her learners, and firmly but respectfully informed the Principal that her student would not miss her class and would meet him after the class ended. She not only proved to her learners how valued they were, but also learnt to become a ‘good advocate’.\(^49\)

Thus, the hidden curriculum of Street Law not only empowers law students with the necessary skills they require for professional life but also steers them towards being responsible citizens.

**Part IV: Hidden Curriculum for Learners**

Street Law aims to consciously use the hidden curriculum as a force for positive change by creating environments that espouse democratic values and civic education. It follows the idea propagated by Dewey by incorporating the ideals it hopes to teach within the environment;\(^50\) the values of freedom of speech, tolerance, non-discrimination will be learnt because the environment is designed to encourage these. Hence, the hidden curriculum awakens them to justice and injustice, education, sexism, and racial discrimination.\(^51\)

The Street Law program increases legal awareness amongst the learners of their legal rights and responsibilities as well as the responsibilities of the state. It also seeks to bridge the gap between

\(^48\) Ibid.
\(^49\) Ibid.
\(^50\) (n 12) 1312.
\(^51\) (n 26).
ordinary people and the legal system so that they become more involved citizens. To achieve this, it aims to create a learner-centric environment that is focused towards the ideas, thoughts, and questions of the learners and empowers them by requiring them to employ independent activity and discourse to play a dynamic role in their educational environments.

This bridge between the students and legal awareness is created by nurturing a democratic learning environment; often law students begin their academic year by allowing their learners to make a classroom constitution which contains rules they must abide by. The learner-centric environment is also ensured by lessons being catered to the pre-existing knowledge of the learners. Thus, learners must engage in critical reflection and contribute to the lessons by extracting useful information from their lives and applying it to the lesson. For example, a law student may prescribe a role-play activity to the class, which is based on their everyday lives. The learners must critically analyze and apply the newly learnt principles to the situation.

There has been great emphasis placed on transmitting the lawyering skills to the learners as well. An example of an activity that transmits these skills is an ‘Alien Game’ often used by law students to signify the importance of various fundamental rights. The learners are informed that the Earth has been taken over by aliens who are only willing to give a few fundamental rights. The learners are given a set of eleven rights in the beginning and the aliens keep decreasing the number of rights humans are allowed to have in each round. Within their groups, the students engage in debate and convince others about why a particular right should be kept or removed. They not only learn the application and significance of rights, but also learn interpersonal, critical thinking, and advocacy skills. Law students who participate in Street Law have realized that learners who consistently attend the Street Law program as part of their regular school curriculum have better critical thinking and analytical skills as compared to learners who participated in a one-off Street Law session. Learners are often required to form and defend opinions in front of the class.

---

52 Ibid.
53 Ibid, 4.
54 (n 26).
55 (n 32); (n 40).
of the class, allowing them to improve their oral communication skills as well. They gain a sense of ‘confidence and empowerment ... as they use their voices and advocate for what they believe... [these] are very powerful learning aids’.\textsuperscript{56} A law student recalls that her learners became more confident after the first few sessions and Street Law also helped them overcome the fear of public speaking.\textsuperscript{57}

The environment that is created is conducive to value the individual personalities of the students and their input.\textsuperscript{58} The law students value their students and the same lesson is transmitted to their learners. A law student, who was teaching at a prison with the Georgetown Street Law program, wrote a recommendation letter for the parole board for a prisoner. Even though the letter was written in a very routine template, the prisoner told him that it was the nicest thing anyone had ever said to him.\textsuperscript{59} As a result of the program, the residents of the prisons started learning to respect and value each other and solve conflicts, by listening to each other and being reasonable.\textsuperscript{60} The feedback received after the program in the prisons included comments that suggested that the course should be made mandatory for everyone, should be taught at an advanced level and that the course was inherently conducive to learning.\textsuperscript{61} Similarly, high school students put in more effort and work because they felt valued. A law student proudly tells the story of his learner, who, in addition to going to school full time, working at a local pharmacy, and often not reaching home until midnight, still took the time to prepare four pages of cross-examination questions for a mock trial.\textsuperscript{62} Thus, the program inculcated a culture of tolerance and acceptance and hard work through the hidden curriculum.

The Street Law program mirrors the ‘pedagogical tact’ and allows learning to take place; the environment enables students to unfold learning

\textsuperscript{56} (n 19) 20.
\textsuperscript{57} (n 40).
\textsuperscript{58} (n 26).
\textsuperscript{59} Ibid.
\textsuperscript{60} Ibid.
\textsuperscript{61} (n 25) 574.
\textsuperscript{62} (n 24) 9. The law student participated in the Street Law program at Georgetown University.
about law and civic participation.\textsuperscript{63} It creates room for the voices of learners to be heard and creates an open exchange of ideas, empowering the learners. They not only learn about the legal system but also gain indispensable skills such as communication, compromise, and collaboration.\textsuperscript{64} Learners participate in the open exchange of ideas and learn to tolerate dissenting perspectives. A law student, while talking about his experience of being part of a street law program said that through this teaching methodology, the learners have to take the initiative themselves so that they can reach the correct conclusion themselves. He said that it made him realize that law is the ‘accumulative common-sense of humanity’ and thus is intuitive for these learners.\textsuperscript{65} These learners also become better at negotiating, evaluating opinions, formulating conclusions, and reaching group consensus.\textsuperscript{66}

Street Law, through its hidden curriculum, helps its recipients have a voice and be better thinkers, communicators, and learners.\textsuperscript{67} It has an immense impact on the lives of its learners; not only in the classroom itself but the skills and attitudes they learn benefit them in their entire lives. One learner from a high school wrote about the program and stated, ‘I truly believe I learned a lot; so much in fact that I am actually considering taking up law later on in my life....’\textsuperscript{68} Many students have been motivated to pursue careers as lawyers as a result of this program; learners of the program have gone on to litigate cases for people on death row and become involved in teaching Street Law themselves. Two law students from the Street Law program at LUMS said that the learners in their classes, who were previously planning to pursue careers in other fields, now plan on pursuing a career in law.\textsuperscript{69}

The effect of the hidden curriculum on learners helps contribute to a democratic society on both an individual and a larger level. They create more civic literacy and produce adults who are involved in democratic

\textsuperscript{63} (n 26).
\textsuperscript{64} (n 19) 3.
\textsuperscript{65} Interview with Umair Ahmad, LL.B student at SAHSOL, LUMS (Lahore, Pakistan, 23 October 2018).
\textsuperscript{66} Ibid.
\textsuperscript{67} Ibid.
\textsuperscript{68} (n 24) 9.
\textsuperscript{69} (n 32); (n 40).
participation. Research indicates that civic learning is one of the most significant predictors of subsequent civic participation, such as voting. Street Law empowers its learners and helps them realise that they can help create change by engaging in thoughtful discussions in a meaningful and critical way. It helps in creating a society of individuals who are informed and interested and helps ‘realize the promise of a government and system of justice that will truly be open and accessible to all.’

**Conclusion**

Street Law is a program that simultaneously trains future lawyers in essential skills and imparts civic education to the masses. It uses the hidden curriculum as a tool for positive change by consciously creating a learning environment that fosters and values democratic ideals. It actively involves the learners in the creation of the structure of their environment by allowing them to make rules and regulations. Additionally, it moves away from the traditional hierarchical models and the use of control as a tool for ensuring ‘civility’; instead, it values student expression and critical thinking. The activities designed to transmit the curriculum proper are interactive and insist that students engage in debate, oral communication, and tolerant attitudes and behaviours; thus, the environment is the message itself.

The program not only inculcates self-awareness and reflection but also makes both the law students and the learners engage in a thorough examination of moral and ethical values that are present in our legal system. It helps them realise that the legal system and the government are relevant in their lives, and they are capable of influencing a change in society. It transforms them into informed and responsible citizens that are better able to participate in the democratic life of their countries. It not only preaches these ideals but enables its participants to have the requisite skills to practice them in their lives. Street Law, through its hidden curriculum, essentially helps create the civic society of tomorrow, comprising better thinkers, community members, and leaders.

---

70 (n 19) 7.
71 Ibid, 14.