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EDITORIAL

WILEY

Guest Editorial: The politics of therapists writing the self or, is everything "copy"?

I write most of this guest editorial during Easter 2020, in the midst of lived experiences of the COVID-19 pandemic impacting everyone everywhere. No-one feels safe; no-one is safe. There have, at the time of writing, been "at least 1.85 million people . . . infected and 116,098 have died worldwide" (Rawlinson, 2020). When you read this, inevitably, the infection and the death tolls will be higher.

The idea, comforting perhaps from a place of fear, that "we're all in this together" is being at least partially challenged by emerging socio-political analyses. For example, a domestic abuse helpline in the UK has reported a 120% increase in calls (Grierson, 2020). For many, then, as we are hearing and imagining (though not, of course, seeing and touching), the lockdown imposed by many governments is not an opportunity to nurture self-expression/development and meaningful personal relationships in the home (and beyond it via technology). It is a time of intense interpersonal fear, attack, and trauma, including the past being relived. Those most at risk in the pandemic are those most at risk anyway—socially, politically, culturally, economically, physically, emotionally, verbally, sexually.

Socio-political analyses of the dynamics of impact bring important sophistication and demonstrate that we can still think despite fear. But we also need to be mindful that the connectivity and community of "we're all in this together" aren't ever completely lost, that the threads between the individual and the collective can be held. Otherwise, we may see some of the long-term impacts of COVID-19 simplistically located *within* those lacking power and resources rather than in the nature of societies that may quickly revert to unkind ways of being as the crisis recedes—just as we have always seen some people pathologised and medicalised for matters over which they have no control. We may then see therapists positioned again, or perhaps even more evidently positioned than "before," as helpers of "the vulnerable," expert, detached professionals who can pick up the pieces of a pandemic of "mental health" or justified emotional distress (depending on your philosophical position) impacting the other: therapists as people who cannot, or should not, be fellow sufferers also doing their best.

Perhaps there is no better time than at arguably the worst of times to offer a collection of writings which clearly position therapists as human beings—and to present doing so as a political act for our times. To set to rest, once and for all maybe, notions that therapists who write the self are naïve, troubled souls unethically oversharing as they struggle with difficult and unusual lives. To declare that, if lived experiences are the bread and butter of therapy, then therapists should be completely welcome at the table—in service to ourselves and our calling, always intertwined.

Solnit (2020) stated that: "There are two ways of making contributions that matter. One is to make work that stays visible before people's eyes; the other is to make work that is so deeply absorbed that it ceases to be what people see and becomes how they see" (pp. 221–222). In therapists writing the self, there are places for both—for beauty and meaning, presence and absorption. Pieces in this special issue challenge *what* therapists are permitted to write and *how* therapists are permitted to write. Inspired and influenced by the style/content offered, in preparing to curate and make a place for the writing, and to suggest how it might be furthered, I have explored creative non-fiction—Solnit (2020); the personal essay—Sedaris (2020); memoir—Gornick (1987); writing about writing—Gornick (2001); writing about reading—Gornick (2020); along with some humour—Ephron (2013).

That those are my starting points, rather than a review of current literature on "therapist self-disclosure" (a term that seems to carry an air of disgust and mistrust, of self-serving, of boundaries always in danger of being crossed),

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reflects even more what this collection is “about.” While speaking or appearing personally to people in the client role certainly exists in the coming pages, and there is, of course, reflection (implicit and explicit) upon clients potentially reading therapist words, the focus here is more expansive: the politics of writing the self—the self who is, among other things, a therapist.

The call for papers was deliberately broad: it asked therapists, qualified and in training, to interpret “lived experience” how they chose. Given the “myth of the untroubled therapist” (Adams, 2013), and a desire to disrupt it, there was also an invitation to share that which therapists don't usually “admit” to, especially in front of peers. Potential contributors were advised that their submission might be how a therapist's lived experiences challenge existing literature, how they support a person in being/becoming a therapist, how they might influence theory, philosophy, practice, ethics, and/or politics, what it might be like to share in writing, how sharing lived experience might impact society and psychotherapy, and how the personal can be made political.

Before turning to an overview of the accepted work, I want to recognise the place of *Psychotherapy and Politics International*, and its editor, Keith Tudor, in supporting writing the personal politics of psychotherapy, including that which is usually hidden. My own early work (Basset & Lee, 2017; Lee, 2017a, 2017b, 2018) appeared in this journal. The way in which it was received here was part of what led to my co-edited book with Emma Palmer, *#MeToo: Counsellors and Psychotherapists Speak About Sexual Abuse and Violence* (PCCS Books, 2020). The book, which has its own specific focus, is something of a companion to this special issue with its broad focus.

1 | PEER-REVIEWED ARTICLES

Our first peer-reviewed article is “Whore phobia: The experiences of a dual-training sex worker-psychotherapist” by Philip Cox and Aella**.** Cox, a researcher currently interested in unintended harm in therapy and a trade union representative (Psychotherapy and Counselling Union, UK), and Aella, a psychotherapist-in-training who is a sex worker (and who uses a self-chosen pseudonym for safety as she is not yet qualified as a psychotherapist; the name Aella is that of an Amazonian warrior), explore an emerging area—an area that, together, they make emerge. The article is organised around a deep conversation: the authors explore what may happen when a sex worker seeks to be/become a psychotherapist and posit sex work (for instance, the management of intimacy and its aftermath) as having connections with the workings of psychotherapy. Psychotherapy is often perceived as normative, conservative, and there's a political challenge being issued here: for psychotherapists to confront sex, and fear of sex anywhere—from codes of ethics to training rooms. Why doesn't understanding sex work appear as standard in psychotherapy training? Does therapy even know what it means by “sex”? Why do sex and abuse get confused by some? There is significant import in Aella's speaking truth to power, which is in no way compromised by her anonymity. As Solnit (2020) observed: “even how you live your life can be a gift to others” (p. 177).

Next in the peer-reviewed paper section we have “Journeying to visibility: An autoethnography of self-harm scars in the therapy room” by Fiona Stirling. Autoethnography is an excellent method for conveying the personal as political, for a politics of writing therapist lives, combining, as it does, the personal, the cultural, and the practices of writing. We could see more of it in published writing by therapists; we could all invite ourselves and others to write it. Stirling is using her own name, and she powerfully illustrates the fear of being personally visible—realising, too, the parallels with the paper's subject. Stirling is clear that in charting her personal journey, she's engaged in political activism. A challenge for readers is to (re)consider what the visible (or invisible) aftermath of self-harm (of any sort) is currently taken to be saying, about anyone; how the scarred therapist body is presumed to be speaking (and/or being silenced); and to consider where discourses of shared pain, shared ways of keeping going, and shared humanity might take us. Self-harm scars are not only self-harm scars.

Helen Swaby's “Learning to ‘live upside down’: Experiencing the true and false self in psychotherapy training” is the third peer-reviewed paper in the collection. This article is a qualitative interview study, analysed using interpretive phenomenological analysis. The impetus for the project, which asked trainee integrative therapists about their training journeys in relation to true and false selves, came from the author's own experiences, and wanting to know how others felt, if they felt as she did. There is much to be said for using ourselves and what troubles us as our starting point, whatever methods we are using, as in so doing we will hear the lived experiences of others in ways that will impact us—sometimes unexpectedly. Swaby keeps the theme of fear live in this collection by recognising the difficulty of bringing her very self to published work, and asking the question that is there, even if unspoken, as an undercurrent in all writing by therapists: the potential impact on clients. It feels like there is something here about the nature of being a client that we've not quite grasped, that we may be on the edges of as we write more therapist lived experiences and think more about this writing. Swaby calls for more sharing by tutors in psychotherapy training of what becoming/being a therapist feels like, especially more exploration of perceived failures/mistakes. It's a suggestion, I feel, that reflects a need for more politicisation of psychotherapy training.

The fourth paper in the peer-reviewed articles section is “Navigating the menstrual landscapes: from the darkness to the light” by Hayley Barker-Smith. This paper returns us to the wonders of autoethnography, how it can be a thing of intense beauty, how it can tease out so much intellectual nuance. Barker-Smith gifts us with a journey through her life, with a focus upon interrogating the personal politics of women's bodies, womanhood, menstruation, PMDD (premenstrual dysphoric disorder), identity, and trauma. There's an important question here about how far therapy and writings about therapy engage with the meanings of womanhood at a deep level, despite so many clients and therapists being women; a space opens up for more to happen. Barker-Smith talks of how freeing herself from women's shame has positively impacted her encounter with the “Other.” Her work is very much in the spirit of this special issue: while, like all of us, she knows fear, she says explicitly that in writing she is seeking to encourage others to put their stories into words. As Solnit (2020) observes of encouragement, it is: “a word that, though it carries the stigma of niceness, literally means to instil courage”. (p. 212).

Jessica Erb’s “Politics of appearance: Bodily transference and its implications for the counselling relationship” is our next peer-reviewed article. At the centre of the paper is a case study that, for reasons both ethical and analytical, is a composite study rather than the more usual interrogation of one person in the role of client. In fact, it is a composite case study of the relating between Erb and “Mrs C,” and its meanings for the therapist as she reflects. Erb politicises the attractive body, argues that the attractive body is perceived to be a body with no lived experiences, acknowledges how many revisions it took to describe herself as looking like the actress Kirsten Dunst. She starts to develop a politics of appearance, drawing upon disciplines beyond psychology, making it clear that attention to the body is not “shallow”—it has much to tell us, for instance, about transference and countertransference. The usefulness of interdisciplinarity is something that we might consider more in the politics of therapists writing the self.

“The lived experience of a psychologist activist” by Dean Hammer is our sixth and final paper in the peer-reviewed articles section. It takes the form of a personal essay, offering another way of therapists writing the self. Hammer writes of his lived experiences of being a transgenerational Holocaust survivor, a prisoner of conscience, and a clinical psychologist—and makes a plea, weaving together these life experiences, for the place of psychologists in “changing the world”. His work brings to mind the longstanding project of this journal's consulting editor, Andrew Samuels, who wants a “therapy for politics,” and the project of this journal itself: to firmly challenge the apolitical nature of much thinking and acting in the therapy field. Hammer's essay was written before the COVID-19 pandemic, but we can read it in the light of current events, and ask ourselves questions as psychologists, psychotherapists, activists. There's such passion that flows through this eloquent writing, a joy in connecting through writing. What is a politics of writing if not passionate?

2 | CONTROVERSIAL DISCUSSIONS

Steph Jones and Amy Hutson, in “Should therapists self-disclose their own mental health in the public domain?” get directly to what will be, for some, the nub of this special issue—something that the contributors mentioned so far have started to reflect upon in their work. The two authors came into contact after Jones wrote very personally for *Therapy Today*, a UK-based, widely received magazine for therapists, mostly those who are members of the British Association for Counselling and Psychotherapy (BACP). The conversation restates my earlier point that what we are primarily talking about in this special issue is not therapy-room relating, even though that is present here, but the politics of therapists writing the self—which has received much less academic/practitioner attention. The authors do not reach a conclusion to their titular question—how could they? What one writes and shares is a personal decision. However, they do talk of how the key question arising—"what happens if a client reads it?" —is particularly relevant in the age of social media and Internet browsing more generally. Issues of "professional suicide" vie with being authentic, congruent, challenging oppression, and breaking down boundaries between clients/therapists. I am glad to have this contribution here, directly naming some of the issues and modelling reflective responses in the face of what can easily become fear-based prohibitions dehumanising therapists. Ultimately, that makes us nothing more than the embodiment of what is (when all is said and done) a job. The theme will be reprised later in this guest editorial.

3 | ARTS & POETRY

The Arts & Poetry section begins with "Further down the line" by Kate O'Halloran. There are connections here to Hayley Barker-Smith's article in what O'Halloran calls the "project of womanness." O'Halloran weaves her way through her own decades of how women are supposed to be, including a relationship with a therapist. As Solnit (2020) says: "When we write about the trauma of gender violence, it's described as one awful, exceptional event or relationship, as though you suddenly fell into the water, but what if you're swimming through it your whole life, and there is no dry land in sight?" (pp. 49–50). O′Halloran, in common with Solnit, has a clear-sighted recognition of what has happened and what is happening; and there's also hope, fluidity, forward movement, change, and development. Gender, and feminism, need to be more politically live in contemporary political writings of therapy; haunting work like this can start to take us to that, if we let it.

The second Arts & Poetry piece is my contribution to this Special Issue, "'Igor's pet cemetery? Igor is out. Burying cat': A memoir of living and dying" (Deborah A. Lee). It's my first foray into writing about death, dying, loss, and bereavement, and probably not my last. I'm wanting to create a "rage-ful" and radical politics of loss, to encourage new writings in the field of political bereavement, where we can recognise—without appearing ungrateful (that worst of things)—that everyone "wanting to help" and "being supportive" is nothing but a neat cultural myth that leaves "the bereaved" unready for pity, indifference, contempt even. The death toll of COVID-19 will be levering so many people now into arguments with bureaucrats who don't really care. My experience of lockdown is that social and physical distancing is nothing new for a widow: people were crossing the street already. It's not sympathy I look for, it's political action. Once time passing takes an individual beyond the immediate rawness of death and bureaucracy, uncaptured rage can be lost, deemed a "phase" in "coming to terms"—and then nothing changes.

4 | NOTES FROM THE FRONT LINE

The first piece in Notes from the Front Line is reprinted with permission from Jo Watson, the owner of the website *A Disorder for Everyone*: http://www.adisorder4everyone.com/. It is "Intergenerational iatrogenesis: A story of diagnosis, medication, therapy, and familial harm" by Erin Stevens. Stevens's mother was diagnosed with schizophrenia at the age of 12—and, as Stevens writes, the message that "she was ill, and she was a problem" was carried with her for her whole life. The piece tells us of intergenerational iatrogenesis, the harms that can come from diagnosis for a mother and daughter. It also incorporates thought-provoking, beautiful poetry from both Stevens and her mother. Political writing, as we see over and over in this collection, can be, is, beautiful. Stevens reprises the theme of the previous contribution, “Igor's pet cemetery,” politicising and challenging notions of “support” being there and being “a good thing.” The teachers at school didn't notice—and their notice, if available, would have likely caused harm.

“A politics of naming and sharing: one therapist's personal journey of traumatic grief, grooming and sexual abuse in the workplace” by Sarah Buxton is the second of the Notes from the Front Line. Buxton draws attention to how the terms we use to describe a lived experience matter. As she says, we generally hear the word “grooming” in relation to children, and this acts to prevent our recognition of the grooming of adults by adults. The language used to describe abuse is an area of significant political import and movement—new terms arise, and existing terms are problematised and sometimes discarded (for instance, “revenge porn”/“image-based violence,” “historical abuse”/“non-recent abuse”). As Solnit (2020, p.8) observed of language: “we need the words, but use them best knowing they are containers forever spilling over and breaking open. Something is always beyond.” Buxton powerfully argues that therapists are just as likely to encounter abuse as anyone else; she recounts a victim-blaming experience of being held responsible for suffering the actions of a perpetrator—*because she is a therapist*. Testimonies such as Buxton's are, like all contributions here, part of a politics of sharing. Buxton wants to educate, raise awareness.

The final Notes from the Front Line piece is “Consciously uncoupling from counselling practice” by Ruth Smith. A term coined by a psychotherapist, Katherine Woodward Thomas (2016), and popularised by Gwyneth Paltrow when she separated from her husband, Chris Martin, “conscious uncoupling” usually refers to the ending of personal intimate relationships, and so it is interesting that here it enters the language of a therapist moving on positively, politically, from being in practice. Smith previously worked as an integrative counsellor with refugees and asylum seekers; she is now a doctoral student. Smith's discussion ranges across socio-political issues, highlighting the silences surrounding them among many counsellors. She recognises that the apolitical nature of much of psychotherapy and counselling is not a “new” issue. Instead, she draws attention to *how many times* politics needs to be raised, and the fact that, even then, it *still* doesn't enter the mainstream. There's something enticing here for any therapist with doubts, and I'd suggest that all of us who see psychotherapy politically harbour some doubts at some time or another. How can we move on from where we are?

5 | BOOK REVIEWS

Our first book review is of Chanel Miller's (2019, Viking) *Know My Name*, reviewed by Concetta Perôt. This is an important book to feature in this special issue—grappling, as it does, in a constant, unfinished process, with being visible and not. Once, we only knew Chanel Miller as the “Stanford rape case victim,” or Emily Doe, the woman who was said to have “ruined” her rapist's swimming career and academic progress. We might have read her anonymous, powerfully impactful victim impact statement. Now, in her new book, we are introduced to her, as a person: Chanel Miller. Perôt, who is a childhood abuse survivor, psychotherapist, and peer-community leader, explores the gradual appearance of Chanel Miller, saying how she “closely acquaints us with her humanity,” something that is often missing from understandings of lived experiences like rape (among other things), where those saying a lived experience has occurred are presumed to be forever defined by it alone. It matters that the book is reviewed by a psychotherapist who is a fellow survivor, who also attests to the power of writing one's life, not to “get back to normal” but as part of the “creation of a new self.”

Drop the Disorder! Challenging the Culture of Psychiatric Diagnosis (PCCS Books, 2019, edited by Jo Watson) is reviewed by Tara Shennan. Shennan is a project manager at Counsellors Together UK, which works to eliminate exploitation of therapists. She is also a therapist and a student of psychology. She praises the edited book, which grew from Jo Watson's *A Disorder for Everyone* events, for how it centralises trauma-informed approaches to distress and contributes to a strong project of humanisation of people (rather than medicalisation and pathologisation).

Shennan also reflects on her own lived experiences to say how she valued finally hearing diagnoses that described how she was feeling, how they were a first step forward. She talks of a need for camps often opposed—diagnosis/antidiagnosis—to be brought together more than usually happens right now. What I feel we are seeing here isn't just a review of a book, but how a book can be the means of people reflecting upon and complicating their own pasts, presents, and futures. It's what the best books in our field offer us opportunities to do.

In recent times at *Psychotherapy and Politics International*, we have sought to have more than one way to write book reviews, particularly encouraging questionnaire-style discussions of books people have found particularly impactful. Our next review is in that new questionnaire-style: Steph Jones reviews *Complex PTSD: From Surviving to Thriving* (Walker, 2013) by Pete Walker. Jones talks movingly of how she had assumed she was "broken, defective and weird"—but after reading this book she now, finally, has hope. Walker's work draws on his own lived experiences, and Jones celebrates how he writes to the reader with qualities of "warmth, compassion, healing, relatability and humour." In Jones' own immediate way of writing, the immense power of finding oneself in a book is evident.

Our final book review is *#MeToo: Counsellors and Psychotherapists Speak About Sexual Violence and Abuse*, edited by Deborah A. Lee and Emma Palmer (PCCS Books, 2020) by Katy Lees. Thanks are extended to Nicola Blunden for handling the review writing process. As mentioned above, the book is a companion to this special issue, and it is good to have it present here and for it be written about so movingly.

The writing you will find in this Special Issue of *Psychotherapy and Politics International* is not a kind of writing that is typically mainstream for therapists: but as Solnit (2020) observed, the margins are "where authority wanes and orthodoxies weaken" (p. 144).

Nora Ephron's mother was the first to declare "everything is copy" (Ephron, 2013, p. 444), and Ephron thought she meant that in you *telling*, rather than you *being told*, "you become the hero rather than the victim." Or, as Ephron (2013, p. 448) wrote with some humour, "she may merely have meant, 'everything is copy'." Both work in the politics of therapists writing the self—in this collection, we see therapists taking and keeping control of their own unique stories, their wide variety of stories. So why not now assert that "everything is copy," or at least could be?

Writing lived experiences is difficult, of course: there's always fear to some degree, as contributors here have discussed—both not-specific-to-therapists and specific-to-therapists. For therapists, clients often loom large, larger maybe than they are in reality. Gornick (2001) said that "to fashion a persona out of one's own undisguised self is no easy thing . . . the writer must identify openly with those very same defences and embarrassments that the novelist or poet is once removed from" (p. 7). This is personally/professionally demanding, there are no places to hide from ourselves or our critics (who can, of course, be one and the same, as all contributors are aware). It is also intellectually demanding—we should generally convey something beyond "naked self-absorption" (Gornick, 2001, p. 10). In my view, therapists writing the self, at its best, is both intellectually/linguistically precise and beautiful, something to come back to. Gornick's (1987) own first memoir told us something of what she desired from personal writers; it offers an exemplar of layer upon layer of rich detail, written in what we all have when we find it: a unique voice. Gornick (2001) knew "who [she] is *at the moment of writing*" (p. 30).

Gornick inadvertently suggested that therapists might be rather gifted at all this. She said that writing personally is "like lying down on the couch in public" (Gornick, 2001, p. 7). She continued: "think of how many years on the couch it takes to speak about oneself, but without all the whining and complaining, the self-hatred and the self-justification that makes the analysand a bore to all the world but the analyst" (Gornick, 2001, p. 7). Therapists *have* generally spent years "lying down on the couch" (usually, we've been sitting on a chair, to be fair), and we're frequently still there even after qualification. Clinical supervision is a constant. We've also spent years in psychotherapy training, something the public hasn't yet seen—the fly on the wall might see the terrified, bored, inspired, and/or engaged (and more) sitting cheek-by-jowl in hot, sticky semi-circles wondering what is going to happen next, sometimes wondering if we should run away and never come back. And we've already written and submitted personal essays and journals, and woken up at 2 a.m. in cold sweats at what we've shared, fearing it/us failing. Our teeth have been cut.

Why does it so matter to *write* the self? Why cannot therapists just *know* our unfolding selves through personal therapy, training, clinical supervision? If we have written, why do we need to *share* it? If we just wrote for ourselves, the terrible spectre of the Googling client would not arise. Gornick (2020) wrote that reading gives us an idea to consider: "Nothing can match [reading] . . . that extraordinary attempt at shaping the inchoate through words—it brings peace and excitement, comfort and consolation. But. above all, it's the sheer *relief* from the chaos in the head that reading delivers" (p. 4). Why shouldn't therapists, dedicated to doing good, contribute to that sort of project—allowing our writing to become reading, if and/or when we choose? It sounds rather joyful. And if clients—the real rather than imagined people—decide to read (they may not), might there not be positives, new ways of seeing, feeling, and thinking, workings-through, even from places of arising relational difficulty? If something is problematic, is it not something to inquire into—whether we are client and/or therapist? Psychotherapy is rarely a field of yes/no answers, and its "academic" side—the reading, researching, writing, and publishing—seems, to me at least, undervalued at times. The controversy of therapists writing the self, the question of whether or not "everything is copy," is suggestive of some areas we need to explore.

That therapists have written the self, and their words are published in this special issue, contributes to developing political psychotherapy, to developing the personal as political in psychotherapy writing. From complicating the meaning of "sex" in/to psychotherapy, to questioning the meanings of self-harm scars in therapy/beyond it, to thinking what it might mean to "consciously uncouple" from practice, to challenging how "the bereaved" are meant to think/feel/act. What has been shared matters much more, I want to argue, than what it might mean if a client inadvertently reads a therapist's writing and isn't pleased by it: for in the absence of sharing we will know no more, nothing will change, and, effectively, shame will win—when it shouldn't stay present anyway. There is nothing shameful in these pages. There is immense value. Therapists have lives; therapists have lived experiences; writing your own life matters; the personal is political.

A change social distancing in the COVID-19 pandemic has brought is a relegation of the ubiquitous (often quite prickly, easily misread) email. In a phone conversation with Fiona Stirling, expanded upon in a phone conversation with Hayley Barker-Smith, I started to develop the notion of a slow, thoughtful scholarship of therapists' lived experiences, of reading all of this special issue like a book, taking time to reflect upon what is being said and what it might mean, rather than engaging in the fast scholarship that often characterises academia, or the immediate dislike of therapists' lived experiences that does seem to circulate in the therapy world at times. Gornick (2020) talked of our "readiness" (p. 117) for particular books, just like potential friends appearing at the right/wrong times. You might come back to this special issue, see it anew. Therapy tells us that life unfolds, that we aren't quite who we were yesterday.

There was, at the time of the call, the intention to have an article in which all contributors participated. This hasn't yet happened—for a variety of reasons, including COVID-19, but in the spirit of slow scholarship we can reflect and revisit that idea later, perhaps seeing who we have all become since this endeavour. I think we have much to learn by thinking about writing the self as unfolding process. No story is a one-off: written, published, job done. Therapy tells us that too. While writing some early notes for this guest editorial, I read Sedaris's (2020) personal essay "Unbuttoned." Sedaris's father is dying. His father is the vigorous patriarch in so many stories over the years: often not likeable but a rounded character, a distinct presence. I mourned him for two days, even when he wasn't dead, even though I'd never met him. It made me think. This is where being present in writing over time may lead: to more connection, more feeling, more inquiring.

I leave the final words to Solnit (2020): "Changing who has a voice with all its power and attributes doesn't fix everything, but it changes the rules, notably the rules about what stories will be told and heard and who decides" (p. 231).

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