Engaging with Curating – Claire Robins

Claire Robins is a lecturer in Art, Design and Museology at the Institute of Education, University of London. She is a PGCE Art & Design tutor for both the full-time and part-time courses and is module leader for the MA Artefacts as an Educational Resource module and the MA Learning and Teaching in Art & Design a practical, studio-based module. Most recently she has taught at Camberwell College of Arts and the South East Essex College. She is the joint author, with Vicky Woollard from City University, of Creative Connections: working with teachers to use Galleries and Museums. Her PhD research examines the educational significance of artists’ interventions in galleries and museums.

Contact Details:
Art, Design & Museology
School of Arts & Humanities
Institute of Education, University of London
20 Bedford Way
London
WC1H 0AL
Tel: 020-7612 6195
Fax: 020-7612 6202
Email: c.robins@ioe.ac.uk
Engaging with Curating

Abstract

This paper is informed by a DfES funded research project, Creative Connections initiated and directed by the Institute of Education (IoE) and Victoria and Albert Museum (V&A) as part of the DfES Museums and Galleries Education Programme 1999 – 2003. My concern here is to focus on an unexpected finding concerning art and design teachers’ negligible engagement with, and understanding of, curatorial issues and practices. This is set against a backdrop of the recent proliferation of literature addressing curatorial matters. The etymology and genealogy of the curator are discussed in order to establish the curatorial role as a symbolic (modernist) location where discourses pertaining to post-structuralism, postmodernism, post-colonialism and critical pedagogy currently coincide. By highlighting some of the main concerns that art and design teachers experience when taking pupils to galleries and museums I suggest that engaging with curating has the potential not only to facilitate critical engagement with galleries and museums but also to empower and inform teachers’ use of these venues as learning resources. Through references to the research questionnaire findings, focus group interviews and evaluations of pilot CPD initiatives, a case for more teacher engagement and understanding of the frameworks in which art and artefacts are encountered is argued. First, as an important dimension for learning and teaching about art and design, and second, to counteract the
generally uncritical and compliant approach to using galleries and museums that can result from a lack of opportunity to engage with cultural concerns.

Introduction

It becomes apparent from even a cursory look at specialist gallery, museum, or contemporary art publications that curatorial practices are being openly deconstructed and significantly reconfigured [1]. The resultant debates are part of the inescapable challenge to the grand narratives of the modernist gallery and museum and therefore have considerable relevance for those involved with learning and teaching in art and design. ‘Stories of art’ are produced through the curatorial process of selection, juxtaposition and interpretation of art as exhibitions and ‘permanent’ displays. These processes affect not just what the visitors see but how they are encouraged to construct meaning and understand their experiences. Additionally, catalogues and other exhibition publications enable curatorial decision making to be disseminated far beyond visitor communities. At the start of a new century in which post-colonialism, feminism and interculturalism inform educational and cultural theory, it is not surprising that galleries and museums are being asked: who has the right to select and represent on behalf of others? Whose history is being told, by whom and for whom? Is the restitution of cultural art/artefacts a postcolonial imperative? How should exclusions from the canon be acknowledged? It also seems timely to ask: to what extent do teachers of art and design consider these issues relevant?
The curator

In museology analogies between church and museum are now something of a cliché. Awe inspiring architecture, stringent codes of respectful and decorous behaviour and a system of belief operate in both institutions and the term ‘curator’ affords just one more bind with its obvious concordance with the noun curate. The job title of contemporary gallery or museum curators has its origins in the Latin: ‘cura’, meaning care, designating both curator and curate as one who has ‘a cure or charge’. In time, fluctuations in meaning encompass ‘one appointed as the guardian of a minor, lunatic etc.’, ‘one who has a cure for souls’ (1450), ‘a manager or steward’ (1632) and later a ‘keeper or custodian’ (1661) [2]. In the manner of the parish curate who looks after the parishioners, fostering their spiritual well-being, the gallery curate[or] looks after the contents of the gallery or museum and perhaps also the cultural well-being of its visitors. For it would seem that the term has a dual aspect, conflating the role of care and maintenance with an efficacious promise of physical and spiritual health. It is also notable that those in the care of the curate are characterised by their need for guidance whether, as in the 15th century definition, through infantilism or feeble mindedness or simply by a hierarchy pertaining to supervision. Curatorial practices in 19th century galleries and museums (practices that dominated well into the 20th century) echoed this description, perceiving visitors to be deficient, lacking knowledge and in need of instruction [3]. Although attitudes have changed, there is still a sense in which curators appear to be responsible for offering redemption to gallery and museum goers who require cultural salvation. To experience the latest curatorial offerings, especially if they
fall into the ‘block-buster’ exhibition category, brings the promise of cultural well-being and the opportunity to accrue ‘cultural capital’ [4].

Traditionally, curators have moved in quiet and mysterious ways. With something tantamount to divine power they have shaped the cultural landscape of art and artefacts, often nurturing and presenting a visual hegemony as if it were the ‘natural order’. The outcomes of their activities have given rise to specific forms of representation in which power relationships and meanings are engendered. But as individuals they went mainly unseen and were of little concern to a visiting public who, nevertheless, absorbed and was inculcated by their ‘stories of art’. In the past, questions concerning curatorial empowerment to select and represent on behalf of others were rarely asked, simple claims to scholarship and rank sufficed. However, these same practices have undergone something of an ‘outing’ in the last couple of decades. Where once the gallery or museum’s authorial construction of meaning may have had a fixity about it, in the latter part of the 20th century, theoretical and praxeological shifts have given rise to a critical examination of the contingent value of meaning. Curatorial decisions have therefore become more readily exposed as the political implications of the use of visual culture in galleries and museums are contested [5].

Gallery and museum educational strategies have started to acknowledge those curatorial excavations that have unearthed, amongst other things, the significance of the visitor as an active participant in the construction of meaning. Elaborating both the economic and cultural importance of this ‘find’, Sharon Macdonald and Roger Silverstone identify how,
in contrast to the historic authority of the museum’s legitimating practices, ‘the
displacement of attention and concern away from the curatorial achievement - the
authority and coherence of the collection - to the visitor’s experience – the authority and
coherence of the person - transforms the context of representation and interpretation’ [6].

It would seem that Joseph Beuys’ paraphrased dictum ‘everyone is an artist’ is about to
be superseded by ‘everyone is a curator’. There is certainly evidence to suggest that
contemporary artists are eager to don the curator’s mantle and much to the chagrin of
certain museum directors [7], ‘even’ museum goers are being ‘invited to appropriate
curatorial power’ [8].

The inevitable ripostes to potential dissolution of curatorial omnipotence have come from
the upper echelons of the museum establishment. Philippe De Montebello director of the
Metropolitan Museum of Art, New York, feels that, ‘If we are to argue for the premium
that our public places on expertise then we should not loosely proclaim, as does one
museum Web site, as it invites you to click on to images at will, … “now you can become
your own curator” [9]. (Ironically this was also a feature of his own museum’s web
which was swiftly removed after he became cognisant of the fact.) Steven Miller, writing
in the Museums Journal, charts what he feels to have been disquieting attempts in the
USA to change the traditional role of the curator by those who were ‘ignorant or jealous
of their esteem’ he identifies ‘Those who attack curatorial positions [as] usually political
appointees, lapsed academics, so called museum educators’ [10]. Miller takes particular
objection to what he sees as the dismantling of curatorial authority as, in his view, job
titles were ‘diluted’ by expanding them to include work such as education or
interpretation. Millers’ polemic ratifies Vera Zolberg’s exposé of the internal power
dynamic of some galleries and museums and serves to illustrate the tenor of some
institutional debates concerning the challenges to traditional curatorial roles [11].

This backlash is not common to all institutions. Noteworthy amongst the clamour to
embrace the ‘c’ word, is the Tate’s 1999 decision, to change job titles in their education
departments from ‘education officers’ to ‘curators of education’. The incentive for this
semantic shift may well reflect an attempt to indicate parity where once, as Zolgerg notes,
a hierarchical divide positioned gallery and museum educators at the bottom of a ‘status
pyramid’ and curators of exhibitions at the top [12].

Teachers of Art and Design

In a questionnaire survey conducted in 2002 by the Ruskin School of Drawing and Fine
Art and the New York Academy of Art, 83 percent of undergraduate fine art courses in
England and Scotland indicated that they taught curatorial practice as optional or
mandatory components of students’ studies [13]. It is not clear from the research in
which year the subject was introduced to the curriculum of fine art departments, nor are
there any statistics from the many design, craft, media, theory and history courses from
which graduates apply to enter the teaching profession. In what appears to be a striking
contrast, the Creative Connections research [14] showed that the majority of art and
design teachers were either unaware of, or unfamiliar with, current issues and debates
surrounding curatorship and/or considered them to be extraneous to their concerns when visiting galleries and museums with pupils.

With the above in mind it would be precipitous not to acknowledge that despite impressions of a shift away from an old paradigm, exhibitions continue to be understood by many pupils as if they had simply fallen to earth, replete with a catalogue. Peter Vergo’s observation that, ‘the creating and [certainly] the consuming of exhibitions remain curiously unreflective activities’ [15] still holds true, and can be observed in the ways in which pupils of art and design are encouraged to make use of galleries and museums to ‘inform their artwork’ but not to extend their own understanding of how exhibitions and collections are formed. Vergo suggests that:

> even were one simply to accept exhibitions as a fact of cultural life, it would none the less seem pertinent to ask, how do they come about? By what means, and with what resources, are they created? Under what circumstances, and for what reasons? More precisely what kinds of exhibitions, and what exhibitions will a particular institution mount? What considerations determine the choice of an exhibition [and] the selection of certain kinds of material within the context of a given exhibition? [16]

His questions cut to the quick of curatorial and directorial decision-making, their articulation demands that exhibited cultural products are located in wider social, cultural and political networks where they are classified and their symbolic and monetary value is generated. But these questions are rarely asked within the secondary school art and design curriculum. Unlike the engagement with visual culture that has developed in schools under the aegis of media studies, the object of study in art and design tends to be
isolated from its frameworks of selection, display and from the promotion of social and cultural values.

Creative Connections research findings confirmed that amongst teachers of art and design in the London area, there was only a small minority who felt that a critical understanding of the curatorial role was relevant for learning and teaching in galleries and museums. In questionnaire responses 42 percent left the section on curating blank; of the 58 percent who replied 68 per cent stated that they did not regard an understanding of the curatorial role to be relevant. To the second part of the question asking whether teachers were confident in their understanding of the curatorial role, 80 percent indicated that they were not. Researchers had not anticipated this finding and therefore its implications were considered relevant for further investigation.

It has long been mooted that the divide between contemporary concerns in art and design and classroom teaching of the subject is both deep and wide. The range of artists’ critical engagements with gallery and museum collections from, to name just a few, Andy Warhol’s Raid the Icebox (1970) through Andrea Frazer’s re-enactments of tour guides (1989; 1991), Mark Dion’s reworkings of cabinets of curiosity (1996), to Hans Haacke’s and Fred Wilson’s (1970 to the present day) revelations of hidden histories and surreptitious sponsors, have left the world of secondary school art and design largely untouched. Seldom do these artists act as stimulus for ways in which pupils might study in galleries and museums nor do they inform the production of coursework in relation to gallery visits. The research findings showed that methodologies employed to engage
pupils with exhibits and collections were dominated by emulative procedures, with observational drawing as the most common mode of pupil response. There are complex reasons why art and design teachers encourage pupils to engage with ‘the work of others’ in particular ways to the exclusion of others but, as Pierre Bourdieu observes, there is also a ‘structural inertia’ whereby ‘the education system contributes to the maintenance of a disjunction between culture produced in the field of cultural production (involving categories of perception related to new cultural products [such as artists’ interventions in museums] and scholastic [classroom] culture; the latter is “routinized” and rationalized by – and in view of – it being inculcated’ [17]. Whilst there is a degree of inevitability about the time it may take for assimilation of very recent theory and practice into a school curriculum, it is important to recognise that these theories and practices are no longer new. In fact, artists’ interventions have almost become an orthodoxy in themselves as museums acknowledge the benefits of importing critiques of their collection’s acquisition and past curatorial practices.

To facilitate a clearer understanding of teachers’ experiences of working with pupils in galleries and museums the researchers organised focus group interviews first with art and design teachers and then with gallery and museum educators. In these interviews many teachers perceived themselves to have insufficient skills, knowledge and abilities to teach their pupils effectively in galleries and museums. They were simultaneously ambivalent about relying solely on gallery and museum educators to teach their pupils, recognising that this conditioned the galleries and museums they could visit and limited what their pupils could see. David Anderson states that, ‘although these institutions [galleries and
museums] can offer some direct teaching services, they do not have the resources to provide learning programmes for every school that visits. For the foreseeable future, teachers taking students to museums and galleries will need to be prepared to act as lead educators’ [18]. Teachers’ anxieties about their own capabilities as lead educators were often based on what they did not know or what they could be ‘caught out on.’ One teacher remarked that his lack of confidence stemmed from a fear of ‘having to think on your feet quickly because there might be a piece of work you haven’t read up on or seen’ [19]. In schools a teacher controls the visual resources that pupils study, this has the built in security of maintaining the teacher’s expert status. In the gallery space this level of control is impossible to maintain. Likewise, providing pupils with authoritative information about the many artworks, artists, craftspeople and designers suggests an absurdly Herculean task. Questionnaire responses from gallery and museum educators corroborated the tensions and conflicting expectations that some teachers experienced in galleries and museums. Their comments also revealed a degree of criticism about teachers’ abilities to conduct independent visits and referred to teachers’ ‘lack of involvement’ and ‘passivity’ [20].

Both the psychological and physical implications of the gallery and museum environment affected teachers’ confidence to teach and caused many to abandon the activity-based, informative teaching activities of the classroom in favour of organisational and supervisory roles. Teachers were concerned that, as visible group leaders, they might appear uninformed or incompetent in a very public arena, as another stated, ‘stood in the gallery, it’s the last place you want to look a fool’ [21]. If 19th Century curators rather
patronizingly understood their audiences to be deficient, lacking in knowledge and in need of instruction, researchers began to see that the museum edifice still had the power to precipitate feelings of inadequacy. Experienced teachers, who would not ordinarily have described themselves in these terms, revealed the extent to which taking pupils into a gallery or museum environment could engender such negative perceptions of their abilities.

Teachers’ concerns about discussing works with their pupils were often predicated by an impression of artworks, artefacts and exhibitions having finite meanings determinable only by the artist or the gallery/museum. The effects of colluding with this quintessentially modernist construction of meaning had the effect of disempowering alternative perspectives whether they were from historical/contemporary theory, their pupils or themselves. And there are some obvious dangers in accepting curatorial construction of meaning as absolute, as Donald Preziosi and Claire Farago highlight:

Most museumgoers [including many art and design teachers] are not prepared (educated) to analyse both the framework and its contents, with the result that museums, as informal educational institutions, perpetuate racial/ethnic/national /gender stereotypes [22].

It is obviously not only, and not all, museums that reinforce such stereotypes; nevertheless the observation is useful. Returning again to art and design’s savvy cousin of visual culture, media studies, a clear, legitimate educational rationale for an analysis of stereotyping in the media is evident. In art and design however, an analysis of galleries and museums as potential bastions of stereotyped cultural values, appears by contrast sacrilegious. In part, it is the persistence of a reverential attitude towards gallery and
museum discourses, seen, in contrast to the mass media, as ostensibly scholarly and educational, that elides an analysis of the values inherent in the exhibitions and collections.

The Opportunity for Professional Development

A dominant strategy, that has emerged as a solution to the concerns and insecurities that some teachers experience when taking school groups to galleries and museums, is to set pupils drawing activities in sketchbooks or to hand out worksheets. ‘We came, we saw, we draw (sic)’ is an approach that has become something of a school orthodoxy. Irrespective of what it is that pupils have come to see, or what they encounter, they simply draw it. Drawing is an extremely valuable activity but it is necessary to question whether as a lone methodology it can facilitate critical interpretations of collections and exhibitions, and allow pupils to ‘discuss and question critically…a range of visual and other information’ as the National Curriculum stipulates [23]. Most importantly, far from being teachers’ preferred strategy, comments made during focus group interviews indicated that this method was employed, not because it was felt to be the most appropriate but because teachers had not acquired the experience and confidence to employ alternatives such as the more discursive interpretive approaches favoured by many gallery and museum educators.
Somewhere along the line art and design teachers are assumed to have attained strategies for effective teaching in galleries and museums but, for many, the specificity of these sites for learning was not a major issue in their undergraduate study or PGCE training. This corroborates Pen Dalton’s suggestion that although ‘art education is offering more choice more diversity and apparent freedom for the teachers and pupils, … access to critical skills, to historical and contextual knowledges and information which would empower the teacher or child to critique or suggest alternatives to the system as a whole are not supplied or even suggested’ [24].

Because so many teachers registered a negligible understanding of the curatorial role it was decided that an opportunity to learn about curating and interpretation should inform the pilot Continuing Professional Development (CPD) initiatives that were developed to provide data. The initiatives were intended to address teachers’ perceptions of their development needs for using galleries and museums more effectively and took the form of a standard one day INSET and a longer accredited course. The initiative with the most sustained long-term outcomes was the accredited CPD course which ran over a nine-month period with taught sessions constituting three days and four evenings.

In this particular model the researchers wanted to see whether the opportunity for critical engagement with the museums’ discourses or ‘fictions’ [25] would increase teachers’ confidence to teach in these environments and expand their use of galleries and museums. Course participants learnt about the construction of a temporary exhibition at the V&A directly from its curator and were informed of the research and expertise underpinning
the selection and inclusion of individual artworks. They also understood more fully the act of ‘personal vision’ that had shaped the theme of the exhibition and its inclusions and omissions. Directly after this session a very different picture of the exhibition unfolded for the participants when two lecturers from London art colleges gave their interpretations of the same grouping of artworks. All three presentations were scholarly and engaging, and each individual gave a different interpretation of the same works. In addition a curator of artists’ interventions in museums and an artist who made work in response to museum collections spoke about their approaches to interpreting collections. Rather than acting to negate each other, these different ‘readings’ enabled participants to gain a more comprehensive understanding of both individual works and the narratives woven by exhibitions. In follow up interviews participants stated that through this demonstration of situated and contingent meaning they had gained more confidence to express and research concepts of personal significance and to translate this into their teaching.

Participants further explored negotiated meanings in exhibitions and collections through discursive workshops with artefacts and images. Participants then began to plan a visit with their own pupils. In preparation for this they were given an opportunity to observe and interview a randomly selected group of pre-booked art and design pupils on school visits to the museum. These Yr 9 pupils had been left to explore a temporary exhibition independently, making drawings at will in their sketchbooks. Before the course a number of the participants would have adopted a similar strategy for visits, but after interviewing the pupils they were unanimous in identifying the paucity of this visit methodology for
maximising pupils’ understanding and engagement. The pupils had needed ‘more input from their teachers’ and ‘more opportunities to discuss and respond to work in the gallery’ [26].

Course participants then planned a scheme of work based around a gallery visit. Prior to bringing their pupils, they were given an opportunity to teach a session in the gallery that they had selected and to receive feedback from other participants and tutors from the IoE and V&A. A spirit of collegiality was made possible through the extended nature of this CPD initiative and participants were able to reflect formally on the changes to their own practice by becoming action researchers. Their analysis of the impact of the project on pupils’ learning was written up as part of the creditable course submission.

In final interviews, conducted six months after the course had ended, all the teachers acknowledged that significant changes had taken place in their approaches to using galleries and museums as learning resources. Many had started to rethink both their own and their pupils’ relationships with these cultural institutions. One teacher recognised that she had previously thought of gallery and museum visits only in terms of meeting National Curriculum or external examination criteria. After the course, the importance of visits in enabling pupils’ life long access to cultural venues became a central aim. She had considered new strategies that would enable pupils to understand the purpose of galleries and museums. The sessions on curatorial decision making and interpretation had directly informed some of her approaches for example: ‘getting the younger kids to think about what they value at home, and if they could put those things in a museum what
sort of museum would it be? - Or creating their own museum within school, or display and labelling and all of those other issues. Quite specific tasks, but allow them their own interpretations, that’s something I’ve learnt... I think the kids are really interested in why it is we’re choosing some things and not others’. She concluded that ‘they [the pupils] had, come away from recent visits feeling more confident and excited about the gallery experience, and more interested in the art’ [27]. This appears to repudiate assumptions that by focussing on exhibitions and their construction, pupils’ engagement with individual pieces of art will diminish.

Another teacher identified a specific change in her approach to using collections and exhibitions since she had become more aware of curatorial issues: ‘I now say how does one image affect the other? Why has somebody put those there? Somebody has definitely considered it, it’s not by accident, you are not just walking into a room and seeing things how they happen to be left, there is a purpose to it’ [28]. Pupils are asked to directly consider the presence of the curator and their part in constructing a visual narrative for an audience. By doing so they can examine ‘how [gallery and museums’] codes and conventions are used to represent ideas beliefs and values’, ‘in works of art craft and design’ [29].

Several course participants encouraged pupils to curate school exhibitions, focussing their consideration of a gallery or museums’ intentions, through examining inclusions, exclusions and the decision-making processes involved in display and interpretation. These newly acquired critical approaches were particularly successful in enabling pupils
to explore issues of value, individual choice, audience, displacement, preservation and conservation.

For the majority of teachers who participated in the pilot scheme organising a gallery or museum visit no longer necessitated passive dependence on gallery and museum staff to provide information and direction. Critical engagement with gallery and museum discourses and newly acquired approaches to working with pupils at these sites had effectively superseded both the transmission model (in which factual information about art and artists is conveyed to all pupils) and a sole reliance on observational drawing. Importantly, the participants felt confident to work with their pupils independently in a range of galleries and museums and had developed strategies that enabled a variety of modes for engaging with artworks including: informed looking, drawing and discussion. Above all, they felt they had more control over their pupils’ learning and how this would inform and extend classroom practice.

Conclusion

The perception of a false dichotomy in which learning about art and design is set in opposition to learning in art and design has militated against a meaningful critical dimension to the curriculum. This becomes exemplified when school visits to galleries and museums are made with the sole purpose of producing drawings to inform pupils’ coursework and where exposure to artworks is mistaken for an understanding of them.
The art and design curriculum is still developing the critical capacity to engage with relevant cultural debates in a way that reflects developments in other subject areas and in contemporary art practice. Dalton suggests that to some extent, this is because it ‘has been shaped in a cultural context where mainstream art educators have little contact with contemporary debates in aesthetics, art criticism or cultural theory, and where contemporary intellectuals and artists have little interest in art education’ [30]. I am not sure to what extent the latter is correct but it is evident that art and design teachers need and want to have access to CPD opportunities that allow them to keep up to date with developments within their specialist field, including those pertaining to galleries and museums. Teachers’ uncertainty about connections between curatorial and pedagogic issues are symptomatic of the cultural context that Dalton explicates, which offers few prospects to look beyond the art or artefact to the wider framing exercise of how it came to be there. MacDonald and Silverman suggest that, ‘In striving to educate …and develop “museum literate” people who know how to view and appreciate objects according to specific paradigms, …museum professionals have long over focused on the task of providing …information, facilitating the traditional or expert discourses as aspects of …[the] meaning making process [31]. The Creative Connections CPD initiatives sought to redress this emphasis by acknowledging that in order to constitute a productive and confident use of galleries and museums, teachers need opportunities to question, in what may appear to be transgressive or irreverent ways, the conventions and institutional values of galleries and museums.
Engaging with curating provided teachers and pupils with another way to think about exhibitions and collections, analysing the concepts of selection, classification and construction of meaning through juxtapositions first rather than simply perceiving the display of art and artefacts as given or inevitable. For most teachers it also meant acquiring and developing new strategies for learning and teaching in galleries and museums. This presented challenges and sometimes demanded a reconceptualisation of existing teaching methodologies which, as Michael Eraut acknowledges, is a ‘learning task of enormous magnitude’ [32] but one which significantly increased teachers’ confidence and abilities to develop independent strategies for teaching critically and creatively in galleries and museums thereby enabling many to move beyond their self-perceptions as ‘docile bodies’ [33].
References


[12] Ibid.


[14] Creative Connections was initiated and directed by the Institute of Education (IoE) and Victoria and Albert Museum (V&A) as part of the DfES Museums and Galleries Education Programme 1999 – 2003. The brief set out to:

- examine how Art and Design teachers currently use London galleries and museums as a learning resource;
- investigate the existing and potential role of both In-service Education and Training (INSET) and Continuing Professional Development (CPD) for promoting effective use of these resources;
- consider the role of gallery and museum educators and their professional relationship with teachers.

The research was conducted over a two-year period and gave rise to a wide range of findings, disseminated in the following publication: Robins, C. and Woollard, V. (2003) *Creative Connections: working with teachers to use galleries and museums as a learning resource*. London: Victoria and Albert Museum & Institute of Education.
[16] Ibid.
[20] Ibid.
[21] Ibid.
[27] Ibid.
[28] Ibid.