ETHICAL STANDARDS FOR GROUPS

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There has been considerable discussion about the ethical aspects of the group movement, which includes a variety of groups going under such names as T-groups, sensitivity groups and encounter groups. However, little if any progress has been made in developing guidelines or standards. There are at least two reasons for this lack of progress. One is that the problem is an exceedingly difficult one. Beyond that, however, is the feeling of some that it is undesirable to attempt to set up standards and guidelines at this time.

Are Ethical Guidelines Necessary?

Verplanck (1970) states a "hands off" position as follows:

"The law sets limits on the behaviors that one individual may show towards another, and these limits will surely apply within a group if its members call for aid. If they do not seek the protection of the law, then can we, as psychologists, set limits when the individual does not? Can we deny to any psychologist or to anyone else the right to lead a group based on his own responsibility, any group whatsoever, with whatever goals? Can we set ethical limits on whether a trainer should be able to choose to assault a group member, or to strip her, if in the situation, he thinks it appropriate, and she elected to accept it? Can he not do whatever the situation demands as he sees it, recognizing that law is concerned only if charges are pressed? I think we cannot interfere, provided and here we do encounter a principle that cannot and must not be violated - the individual in the group has freely chosen to join it, and to accept its styles."

Corsini (1970a) takes another tack when he appeals to the need for experimentation as a basis for an "anything goes" position:

"I think that the best thing right now is hands off. It is probably best not to try any policing. We just don't know enough. Just as Coulson quotes Rogers about trusting the wisdom of the-group, so too, I think that we must all trust one another, even the people we know are fools and have no business trying to do group therapy or sensitivity training or encounter work. I don't think that anyone can really know what is right and what is wrong. A couple of years ago if a psychologist had done what some people are now doing, he would have been arrested. We are in a mad wild period of uncontrolled growth, development and experimentation and I think
this is good. After a while, the excesses will become evident, the dross will be cleaned off, and we may get some greater understanding. We are in a period of frenetic growth and evolution."

In effect, these statements by Verplanck and Corsini represent the conditions under which we are now operating. That these conditions are not acceptable to many professional psychologists and psychiatrists is evident from the interest in developing more explicit or restrictive guidelines or standards.

Strassburger (1971) takes a somewhat less extreme position, but essentially he would go no farther than requiring full disclosure of information to the potential participant, with no coercion to bring anyone into a group or to keep him in one. Advertising would be permitted but would be screened by a local professional or multidisciplinary group:

"Beyond this, there should be as much freedom of experimentation allowed as possible within the bounds set forth in the 'Preamble' to the Ethical Standards of Psychologists (APA, 1968): 'The psychologist believes in the dignity and worth of the individual human being . . . while demanding for himself freedom of inquiry and communication, he accepts the responsibility this freedom confers: for competence where he claims it, for objectivity in the report of his findings, and for consideration of the best interests of himself and of society.' "

Part, if not much, of the motivation for greater control or regulation of groups arises from an increasing reaction against groups among the public in general and among members of the education professions in particular. The term "sensitivity group" is coming to have a negative connotation, and to lead to resistance, even fear, among many educators. Silberman, in his widely read and influential "Crisis in the Classroom" (1970), presents an extremely negative reaction to sensitivity training:

"Sensitivity training also holds tremendous potential for harm. . . Even with qualified trainers, sensitivity training can be dangerous; the human psyche is too fragile and too personal to be casually probed by professional or amateur psychologists. To insist that an individual expose his psyche for someone else's purposes - for example, to improve the efficacy of the organization in which he works- is, at the least, a gross invasion of privacy, More seriously, sensitivity training can have seriously adverse, even disastrous consequences on the mental health of the people involved. What Birnbaum [1969] calls 'the effort to stimulate exaggerated behavior in order to get at the motivation behind it' is, after all, a form of psychological probing for which neither the trainee nor the trainer may be prepared. The risk of psychological damage is compounded by the brevity of the experience and its residential nature, which inject an extraordinary and abnormal intensity into personal relationships; even at its most benign, sensitivity training tends to be a 'shocking and bruising experience.' The risk is compounded still more by the usual training technique, which is to break through the defenses with which normal people cloak their attitudes, feelings and motives. As the film Bob and Carol and Ted and Alice illustrated with devastating humor, most trainers are
doggedly persistent in the attempt, for part of the need of sensitivity training is that people should be 'open,' 'honest,' and uninhibited in their relations with others."

It is useless to argue that Silberman is talking about marathons, and about only some of those, as well as about only some trainers. Encounter group leaders of the Coulson-Rogers persuasion, for example, are quite different from the characterization given by Silberman. But we are all tarred with the same brush, and in the eyes of the public we are all seen as the worst.

However, it is also difficult to argue that groups are or can be dangerous. There is considerable evidence that some clients in individual therapy do not improve and that some get worse. Presumably this is also true in group counseling or therapy. But it is a step beyond to claim that so-called "normal" persons in sensitivity or encounter groups can be harmed. Individual instances can be cited, but they are hard to come by, and it can be argued that those who do become seriously disturbed while in a group were not normal to begin with. There are no adequate statistics, and such as they are they suggest that the incidence of severe disturbance requiring hospitalization or psychotherapy is very small.

Nevertheless, most professionals feel that there are dangers in groups, though they seem to feel that the dangers exist in groups led by non-professionals, or by professionals using a different approach than their own. Any powerful treatment or intervention holds a potential for harm as well as for good; groups may be "for better or for worse." Yet Corsini (1970) states: "I have never in twenty years of experience seen any harmful effects in any group where there is absolute freedom of choice for all members."

But it is doubtful if there is absolute freedom of choice in any group. Verplanck's principle stated above seems to be generally accepted, but it is not so simple to assure that it is applied and adhered to. There are degrees of voluntarism. People are attracted to groups, and submit themselves to a group experience even when they do not like it or agree with its operation. Apart from the virtual impossibility of selecting to keep out disturbed or borderline individuals who "want in," there are elements of coercion in most groups, and it might be argued that this element is strongest in those groups which are most likely to be harmful.

One of these elements of attraction and influence is the status and prestige of a leader or trainer. To the layman, anyone who proclaims himself a trainer or group leader is qualified, and has an aura of competence and authority. Anything which he does is assumed to be right and good. Thus participants in a group will put up with anything - literally, including being undressed by the leader if they trust the leader, believe that he knows what he is doing, and therefore think that it must be good for them. As the surgeon's patient doesn't question his decision to operate, so group members do not question the demands of the leader. They may be uncomfortable, they may suffer, they may be hurt in varying degrees but they will not complain, or, as Verplanck feels they would, appeal to the law for aid. For this reason it is clearly not sufficient to permit group leaders to do anything as long as members do not appeal to the law. This is a very
disturbing or distressing lack of control. Moreover, the law is not a substitute for ethical standards. Law sets an outer or extreme limit, a minimum standard of behavior. Sexual intercourse without the consent of another is rape, and is illegal; rape may also be present when there is undue influence or use of one's status or position as a group leader. The doctrine of consent is not a simple or absolute one.

In addition to the lack of real freedom of choice posed by the attraction of a group experience because it is "the thing to do" and "everyone is in a group," and the trust and confidence in the competence of the leader, there are forces in the group itself which limit or reduce the real freedom of its members. Groups can exert a tremendous pressure toward conformity, so that an individual member may do things which he does not want to do, which cause him pain and discomfort, and which may be damaging to him as a person, not only because he may believe that they are "good for him," but because he does not want to be different, because "everyone else is doing it," and because it would be an admission of weakness, or lack of courage not to do so. To leave a group when under pressure or attack, or in the "hot seat," would be to "chicken out." Shostrom's films are a beautiful illustration of what a group member will put up with and go through under these circumstances. And incidentally, these films, which are available to the general public, may in the writer's opinion, be dangerous in that they illustrate a method of conducting groups which could be disastrous when practiced by untrained, non-professional persons. It is in my opinion unethical to rent and sell them without restriction.

It might be argued that the concern of the profession applies only to control of its own members, and that, although current ethical standards statements do not specifically cover the group situation, the basic general principles of ethical behavior are present. Professionals, it might be argued, can be trusted to be ethical in the details of their operation. Thus, specific ethical standards are not necessary for counseling or psychotherapy groups, or for professional leaders of groups, and other kinds of groups and leaders are not the responsibility of the profession.

But it is apparent that what others do affects the profession. The public does not discriminate between professionals (psychologists and psychiatrists) and others who conduct groups. Moreover, it is apparent that professionals are doing many things which are questionable; to justify them on the basis that they are "experimental" is an evasion of responsibility. There is thus not only the problem of the untrained, but of the professionals who are "doing the damndest things" (Corsini, 1970). Are we to say that the professionals should be permitted to do anything they want because they are professionals? This, of course, is not the case in the practice of counseling or psychotherapy, or in research. Then why should it be so in the case of group practices? Dreyfus and Kremenliev (1970) point out that many professionals feel pressure to use group approaches or techniques when they are not competent, often on the basis of observing or participating in only one demonstration or brief workshop.

There is an aspect of the group movement which is significant here. The conducting of sensitivity and encounter groups is becoming big business; it is currently a "growth
industry." The commercialization of the group movement presents some temptations to leaders, and creates, or exacerbates, some problems. The essence of business is competition. Competition leads to the attempt to build a better mousetrap so customers will beat a path to one's door. Often, of course, it is not necessary to build a better mousetrap, but only a different one, a more appealing one, a more impressive one, a more sensational appearing one.

In the field of groups, the competition appears to be a reason for the proliferation of gimmicks, techniques and "games" which will appeal to potential customers. Group leaders who are making a lucrative living from groups are seeking something new, different, innovative or sensational with which to attract customers. None of these have been tested or demonstrated to be effective or useful, and none of them are being evaluated by research. They are simply used and accepted on the basis of the prestige or status of the leader. If methods are to be used on an experimental basis, they should be subjected to evaluation for their results and effectiveness.

Such evaluation should recognize and take into consideration in the research design the influence of two factors which appear to be universally ignored in the research on groups and in the subjective evaluations of group experiences. Group experiences, particularly those using charismatic and high pressure salesman type leadership and unusual techniques and gimmicks, are shot through with the placebo and Hawthorne effects.

Experimentation is certainly desirable. But there are limits to experimentation with human subjects. What are these limits as applied to experimentation in group techniques? Corsini says there are none. Yet he writes (1970):

"I see a lot of people who are not well-trained, are personally too maladjusted, and who are playing with what they do not understand, getting involved in this encounter group movement. A lot of concerned professional people are worrying about the excesses of some of their members... Ministers, teachers, group workers, and just plain housewives are trying to be therapists, running groups, and doing the damndest things."

If groups are experimental - and many of them are clearly highly experimental in nature then the participants need as much protection from possible harm as do subjects in research experiments. In fact, they need even more, since group leaders have little if any concern about evaluating the effects of the purely experimental techniques many of them are using. While there are some well-researched and validated methods of helping people, or facilitating their personal development (empathic understanding, respect and warmth, and therapeutic genuineness), many group leaders are going beyond these methods and using techniques which have no support whatsoever in research.

It seems to be clear that some standards or guidelines are necessary, to protect group members from the potential dangers of unvalidated methods or techniques, whether used by professional or nonprofessional group leaders.
What Has Been Proposed?

Many individuals and groups have struggled, and continue to struggle, with the problem of ethical standards for groups. Lakin has dealt with the question more extensively than most (1969, 1970a, 1970b). In his earliest paper, he notes that the claim that leaders of encounter and sensitivity groups are not engaged in psychotherapy "compels one to consider ethical implications of the differences between the contractual relationships between participant and trainer, on the one hand, and those between patient and therapist, on the other." But it is difficult to draw a sharp line between these groups and therapy groups, particularly as they have developed and changed from the early T group method. The goals have become more similar, and the processes are practically indistinguishable. Whereas earlier the focus was upon the dynamics of the group process, rather than the personal experiences of the participants, this is no longer the case. Trainers earlier did not attempt to elicit or force personal disclosure; now most of them do. Whereas earlier "the generally accepted hypothesis was that the best psychological protection against unwarranted influences was individual and collective awareness that could forestall insidious manipulation by dominant leaders or conformist tyranny by a group," this hypothesis no longer holds. As Lakin notes, "many people currently involved in the various forms of training are not as psychologically sophisticated as were the mainly professional participants of some years ago."

Thus, while many groups are clearly therapeutic, the disclaimer that this is indeed the case prevents the application of ethical principles relevant to psychotherapy to such groups. It is thus necessary that new standards be developed on the basis of the nature of these groups. Lakin discusses the ethical problems in setting up a group experience, in conducting the group, and following its termination.

Lakin suggests that unlike psychotherapists, leaders of training groups cannot spell out in advance their intentions, the process and its consequences, since "it is not feasible to explain these because training . . . depends upon events that counter the participant's accustomed expectations in order to have maximum impacts." Thus, it becomes crucial that the leader be adequately trained. Yet many leaders are not trained, and show no awareness of or concern about their professional limitations. Lakin feels that even competent trainers "have done little to deter the belief that training requires little preparation" He suggests that "a degree in a recognized educative or therapeutic discipline is certainly one index of responsible preparation. For work with the public, trainers should have had, in addition to a recognized advanced degree in one of the 'helping professions,' background preparation in personality dynamics, a knowledge of psychopathology as well as preparation in group dynamics, social psychology, and sociology. They should also have had an internship and extensive supervised experience." In his response to Coulson's paper (1970a), he is more specific in outlining a three-year sequence of experiences, including participating in two groups, observing and discussing five groups with their leaders, co-leading five groups, and leading five groups. In addition, the trainer should have had psychotherapy or "some equivalent," be evaluated by well-qualified trainers, and "keep up to date."
Lakin attacks the advertising that implies that training is psychotherapy, and that offers hope for deep personality changes. He proposes that "immediate steps need to be taken"... to evaluate and "monitor promotional methods in order to safeguard the public's interest and professional integrity."

Ethical problems arise in the process, according to Lakin, with the advent of more active, directing, and pressuring methods by trainers. Such methods create, as they are intended to do, emotional effects which may not be worked through. To the argument that participants agree to these practices, Lakin states that "the fact that the consumer seeks or agrees to these experiences does not justify them as ethically defensible or psychologically sound. . . It cannot be assumed that the participant really knows what he is letting himself in for."

Lakin raises very important ethical issues, but does not indicate how they are to be resolved. In his later paper (1970c) he similarly discusses some of the problems and abuses of group sensitivity training, but again with no specific recommendations for standards to prevent these abuses. Here he acknowledges that "not always is a degree any kind of guarantee of competence."

**Some Suggested Guidelines**

The appeal for freedom is appealing, but not convincing. There are a number of factors which those who make this appeal overlook.

Coulson, in his response to the critics of his paper on encounter groups (1970), in agreeing with Corsini's position seems to resort to the argument that all group leaders are men of good will and of love, and thus can do no harm. "The professional effort to put brakes on development and the concern we see now in journals and in many of the responses seems to me a mistake, though possibly self-serving. If you can't trust that when people bear on one another they will want good things for themselves, then I don't know what you can trust. . . If we cannot rely on one another's wanting to be kind . . . then we are in great trouble as a people and we are." Two things are wrong with this statement. It assumes that all group leaders are genuinely kind and loving and men of good will, which is doubtful in the light of the commercialization of groups. Second, it assumes that to be of good will is sufficient. It is not. Competence is also necessary.

When we speak of competence, we come up against another factor overlooked by Strassburger and others. These discussants appear to assume that all groups are led by trained and qualified psychologists. But they are not, and that is a major part of the problem. Those leaders who are not professionals do not bind themselves by the Preamble to the Ethical Standards of Psychologists. And further, there are no trained psychologists who trade upon their presumed competence as a justification for doing anything they desire, under the pressure of competition, with no concern for the results or effectiveness of their "experimentations."
If every trainer or group leader met the training requirements outlined by Lakin, we would not need to worry. But this is not a realistic way out. Some would feel that these requirements are too high, or at least unrealistic. As Lakin himself admits, degrees are not necessary or sufficient. It is not likely that we can agree upon the necessary and sufficient requirements in terms of training. We cannot even set out the minimum requirements which all would accept, including those who are now leading groups with little if any training, but with great self-confidence.

If we cannot depend upon good will and good intentions, or upon self-policing in terms of adequate preparation when there is no agreement on what constitutes adequate preparation, then it would seem that it is necessary that attention be given to specific behaviors. Guidelines relating to specific behaviors have two advantages: (1) they avoid the problem of evaluating competence in terms of education or training; and (2) they are more easily applied and evaluated since they are more objective in nature.

As a basis for discussion, the following suggestions for guidelines are made. We shall consider three phases: the pre-group phase, including advertising, the group process, and the post-group phase.

1. Advertising and announcements of group experiences should follow acceptable professional standards.

Strassburger (1971) would permit newspaper advertising which has been approved by a local professional or multidisciplinary group. He recommends "simple, descriptive, nonevaluative ads that do not give clients an exaggerated idea of what they may expect." Lakin (1969) recommends the "elimination of promotional literature that suggests that training is, indeed, 'psychotherapy,' and that it can promise immediate results." The following statements from the APA Ethical Standards of Psychologists (1968) are applicable:

"Modesty, scientific caution, and due regard for the limits of present knowledge characterize all statements of psychologists who supply information to the public, either directly or indirectly.

A psychologist or agency announcing nonclinical professional services may use brochures that are descriptive of services rendered but not evaluative. They may be sent to professional persons, schools, business firms, government agencies, and other similar organizations.

The psychologist must not encourage (nor, within his power, even allow) a client to have exaggerated ideas as to the efficacy of services rendered. Claims made to clients about the efficacy of his services must not go beyond those which the psychologist would be willing to subject to professional scrutiny through publishing his results and his claims in a professional journal."

2. The leader or trainer is obligated to state his qualifications, including his education (major fields of study and degrees) and training for leading groups.

The following statements from the APA Ethical Standards of Psychologists apply:
"The psychologist avoids misrepresentation of his own professional qualifications, affiliations, and purposes, and those of the institutions and organizations with which he is associated. A psychologist does not claim either directly or by implication professional qualifications that differ from his actual qualifications, nor does he misrepresent his affiliation with any institution, organization, or individual, nor lead others to assume affiliations he does not have."

3. The leader or trainer is obligated to indicate the general nature of his methods or techniques, and what is expected of clients or participants in his groups.

While it may be that a leader or trainer cannot specify precisely what he will do or what will happen in his groups, it is also true that he can specify his general approach or procedures. With the great variety of techniques and procedures now being used, it is necessary that potential participants be given some information upon which they can base a decision whether or not to participate. Strassburger (1971) states that "There should be full disclosure of goals, orientation, and techniques of an encounter group."

Unusual procedures or methods (such as nude groups) should be indicated, so that individuals will not be drawn into such groups without being aware that they will be expected to participate in procedures which may be inconsistent with their value systems or styles of life, and exposure to the resulting coercion to engage in such activities. The statement of such procedures should not indicate or suggest that they are effective or lead to desirable results. The following statement from the APA Ethical Standards of Psychologists applies here:

"Claims that a psychologist has unique skills or unique devices not available to others in the profession are made only if the special efficacy of these unique skills or devices has been demonstrated by scientifically acceptable evidence."

The following statement, from Ethical Standards for Psychological Research (1971), would appear to apply here, particularly if for "study" and "research" the terms "experimental procedure" or "unvalidated technique" are substituted:

"It is the responsibility of the individual investigator to make a considered judgment with respect to the ethical acceptability or unacceptability of each study he undertakes. He may not abdicate this responsibility on the grounds of current practice or the judgment of others.

When a psychologist plans to conduct research involving potential risks and costs to human subjects he should seek the advice of an ethics advisory group in deciding whether to proceed.

It is unethical to involve a person in research without his prior knowledge and informed consent.

In recruiting subjects for research, the investigator must give potential subjects an honest description of the study without misrepresenting the purposes, procedures, benefits or sponsorship of the research."
4. While it is not possible to effectively screen participants, or reasonable to require an elaborate screening procedure, leaders and trainers should be alert to evidences of disturbed behavior of participants.

The psychologically trained leader will recognize individuals for whom the training or process may be potentially harmful, and request that such a person leave the group, or make a referral for appropriate psychotherapy.

The leader or trainer without adequate psychological preparation should arrange for and have available professional consultation.

The following statement from Ethical Standards of Psychologists is applicable: "The psychologist attempts to terminate a clinical or consulting relationship when it is reasonably clear that the client is not benefiting from it."

5. "No coercion, either subtle or overt, shall be used to bring someone into a group or to keep a person in a group. There shall be complete freedom to leave a group at any time." (Strassburger, 1971).

While, as indicated earlier, it is perhaps impossible to avoid some psychological pressure upon the individual to remain in a group, the leader or trainer should be alert and sensitive to the need or desire of an individual to leave the group, temporarily or permanently, and should not permit the group to coerce the individual to remain, or join the group in such coercion.

The Ethical Standards for Psychological Research state:

"The investigator must recognize the subject's right to drop out of the research at anytime. Efforts to prevent this through legitimate reassurances and clarification of misunderstanding must avoid . . . coercion."

6. The trainer or leader is obligated to protect members of the group from physical or psychological harm from other members.

This is a very difficult area to deal with. There are those who, citing Rogers and Coulson, would appeal to the "wisdom of the group" and feel that the leader should take a "hands off" approach when a member is attacked by others. There are also those leaders who precipitate or encourage attacks by members of the group on one another, and who claim that the pain and suffering of the person attacked is necessary for his further development.

The reasonable answer would seem to be that great pain or suffering is not necessary for personal change and development, and certainly is not desirable in itself. Physicians minimize pain during the healing process. In addition, it may be hypothesized that the harmful effects of groups upon certain individuals may result from excessive attacks
upon vulnerable persons. While this hypothesis has not been supported by research, it is a reasonable one. Moreover, the alternative hypothesis that growth occurs only through great pain or suffering has not been supported.

This is perhaps one of the crucial issues in groups. While the avoidance of methods or techniques which lead to great pain or suffering in individuals may seem unduly restrictive to many, it is, under the rubric of "conservative management," one of the basic principles of medicine. Active intervention is justified only when there is some evidence that the procedure is effective.

7. The trainer or leader is responsible for providing some follow-up of group participants. This is particularly important in marathon groups.

In most cases it is probably sufficient that the leader or trainer indicate to each participant that if he should feel disturbed or distressed following the group experience, he should seek professional help, and sources of such help in the participant's community should be provided.

An important aspect of this principle is the recognition of differences among group members at the conclusion of group meetings. Some members may be at a stage of personal development where they are upset, disturbed or confused by what has happened to them in the group. They haven't been able to integrate their experiences, to "put it all together." The leader should be able to recognize this state, and has an obligation to provide or make available an opportunity for further help, through individual counseling, or continuation of a group if there are several such persons, or referral to individual counseling or another group.

Where Do We Go From Here?

The preceding guidelines are offered as a basis for a statement on ethical standards in groups. Such a statement is necessary for the reasons indicated earlier. The statement should allow maximum freedom, while at the same time providing at least minimum protection for participants in groups. It is felt that the tentative guidelines proposed do this.

The problem of who should develop such a statement arises. Since so many group leaders and trainers are not psychologists, nor psychiatrists, nor identified with any profession, it may be questioned how effective any statement could be. It might be suggested that the persons who are actually conducting groups should develop guidelines. But there are at least two problems here. The first is that there is no organization of such persons, professional or otherwise. The second is that, not being professionals, many are not concerned with, interested in or aware of concepts of professional responsibility.

If there is potential danger in groups and the writer, as well as many others, is convinced of this, simply because anything which is powerful for good is also powerful for damage to persons there must be some concern for protecting the public. Since the
group process is a psychological phenomenon, it would clearly fall within the province of psychology to be concerned with its exploitation for good or evil. Hopefully, then, psychologists will assume this responsibility. Such a responsibility must be discharged without being self-serving, or attempting to restrict practice to a narrowly defined group with traditional academic training in psychology. Problems in the practice of psychology arise because psychology cannot, and should not, be limited to professionals. To some extent everybody is, and should be, a psychologist. As George Miller (1969) puts it, we must "give psychology away," that is, help every individual become a psychologist in terms of functioning in a way which facilitates the development of others.

This does not mean, however, permitting others to engage in psychological activities without adequate understanding of or preparation for what they are doing. While every person is in a sense a psychologist, we must help each person to become a good psychologist, and protect each person from possible harm from others using psychological methods which are experimental in nature and which have not been evaluated for their effects.

Since we cannot restrict the practice of psychology (in the broad sense of human relationships) to psychologists, and until we have educated everyone in the basic principles of good human relationships, it seems that we need to develop statements which reflect what we know about good human relationships by specifying behaviors which we can agree should be engaged in and those which should not be engaged in.

Such statements should be simple and clear, so that they can be communicated to and understood by the general public. Then it is the public, the potential clients or customers, who can control the practice of psychology. It is only when the public is educated in psychology, however, that we can accept the doctrine of "let the buyer beware."

References


