DISCIPLINE AND CONTROL OF TEACHERS IN SCHOOL ADMINISTRATION

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Introduction

One of the most pressing issues in school management is discipline as it concerns administrators, teachers and students. This is quite imperative because no meaningful academic achievement can be attained in any educational setting where there is disorder, disobedience, anarchy and lack of self-control among teachers. Looking at the disciplinary problems in the school system, Ndu in Obi (2004), decried the observed patterns of indiscipline in the three levels of Nigerian educational system (Primary, secondary, and tertiary levels) given the high level of violation some laid down professional conducts by teachers. The breaches may be in form of professional misconduct, incompetence or negligence of one's professional responsibilities and obligations. In view of this, Peretomode (2001) succinctly pointed out that the State Education Commission or Post Primary Schools Services Commission which is responsible for the appointment, posting, promotion and payment of salaries and allowances of teachers is charged with the overall disciplinary control of teachers in her service. In addition, the Teachers Registration Council of Nigeria (TRCN) equally established tribunal for trying teachers who breach professional conducts and other indulge indisciplinary acts.

The actions that are seen as professional misconduct and indiscipline among teachers are discussed in this paper. Various breaches of professional conducts and punishments appertaining to them as outlined in Education Law and teacher's service manual are discussed. The disciplinary committees provided by the Teachers Registration Council of Nigeria (TRCN) for handling issues of professional misconduct and general indiscipline among teachers also formed part of the discuss.

Concept of Discipline

Discipline has been variously defined by different authors. Most often the definition depends on the perspective of the individual author. Some see it as closely linked to order and self-control while some others link it to punishment. Onyali (2014) views discipline as the sum of educative efforts, including the teaching process, the process of character shaping, submission to rules and authority as well as the development of trust. For the purpose of this work, discipline can be seen as a systematic method of obtaining compliance or order and obedience among teachers to

ensure that the set goals of teaching and learning are realized. Discipline thus involves the following three elements;

(a) Training to act in accordance with rules, drilling military discipline,
(b) Activity, exercise, or a regimen that develops or improved a skill,
(c) Punishment inflicted by way of correction and training. Discipline is therefore a control that is gained by requiring that rules or orders be obeyed and punishment be given to bad behaviour. Ndu in Obi (2004) sees discipline as training that develops character, orderliness, self-control and efficiency. Discipline is defined as the practice of training people to obey rules or a code of behaviour, using punishment to correct disobedience. Discipline therefore may be broadly seen as:

1) Training expected to produce a specific character or pattern of behaviour, especially training that produces moral or mental improvement.
2) Controlled behaviour resulting from disciplinary trainings; self-control.
3a) Control obtained by enforcing compliance or order:
b) A systematic method to obtain obedience;
c) A state of order based on submission to rules and authority.
4) Punishment intended to correct or train.
5) A set of rules or methods, as those regulating the practice of a church or monastic order.
6) To train by instruction and practice especially to teach self-control; to teach to obey rules or accept authority.
7) To punish in order to gain control or enforce obedience. (www.thefreedictionary.com).

Without prejudice, discipline in any educational institution could be seen as a functional product of self-control, orderliness, tolerance, self-restrain and honesty. Also included in the list is integrity, commitment, perseverance, accountability prudence among others. A disciplined teacher is one that has established a goal and is willing to achieve that goal at the expense of his/her individuality. It is the assertion of will power over more base desires, and is usually understood to be synonymous with self-control. A teacher who is self-disciplined has the ability to control and overcome his weaknesses, pursing what he thinks is right despite temptations to do the contrary. A violation of disciplinary life of the school affects teaching and learning negatively. It is therefore, ripe to state that teachers' discipline and control is fundamental in the realization of school aims and objects.

School Administration

In the school system, the primary objective of administration has to do with the co- ordination and integration of all the factor resources for effective, efficient and functional teaching and learning. It is in this line that Ezeugbor (2014); Nwosu and

Modebelu (2016); Okorji and Unachukwu (2014) see administration as the process of mobilizing all factor resources for the achievement of pre-determined goals and objectives of education.

School administration according to Ukpong (2016) is the ability of teachers to utilize the scarce factor resources to influence students positively towards learning. In addition, school administration involves managing, administering the curriculum and teaching, discipline, examination and evaluation. These onerous responsibilities are carried out by the school administrators through collaborative decision making, planning, organizing, directing and supervising every aspect of the school programme with special emphasis on teaching and learning. Achieving these demand that the school environment should be characterized with obedience to rules and regulation, orderliness, self-control and over all discipline especially among the teaching staff. Different bodies like the Federal and State Ministries of Education, Nigerian Union of Teachers (NUT) and Teachers' Registration Council of Nigeria (TRCN) in recognition of the obvious need for discipline in Nigerian education system have prescribed various codes of conducts for teachers and punishments following infractions of such code of conducts. This is geared towards maintaining professional standards of practice and conduct that are universally acceptable in Nigerian education system.

Discipline and Control of Teachers

The Federal Ministry of Education (1990) in the Nigerian teachers service manual article 5.2 states that infringement of any article of the code of conduct shall incur punishment by the schools management board in the case of Principal/Headmaster, and by the Principal/Headmaster and Schools Management Board in the case of teachers. Such punishment shall range from caution to dismissal depending on the gravity of the offence. It is emphasized that the principle of fair hearing is imperative.

In the case of teachers' misconduct punishment to be given by the Principal/Headmaster shall take the form of;

a) Oral caution;
b) Written caution recorded in the log book;
c) Surcharge (for absenteeism from school or such dereliction of duty);
d) Adverse annual report;
e) Suspension from class with an immediate report to the relevant authority requesting ratification of the suspension and placement on half pay, pending appropriate action by authority.

Punishment by the Schools' Management Board may take the form of;

a) Written caution
b) Suspension on half pay (example; where court case is in progress).

c) Withholding of increment
d) Withdrawal of salary
e) Reduction in rank
f) Retirement
g) Dismissal
h) Removal of offender's name from the register of teachers.

Infraction by Teachers

The case of infraction by teachers as outlined by Peretomode (2001, pp. 196), rests on the following:

1) Lateness to school and school assemblies
2) Interval absenteeism from school
3) Lateness to the classroom for teaching
4) Failure to prepare lesson notes
5) Failure to attend staff meetings
6) Failure to make use of the blackboard in teaching.
7) Examination malpractice (aiding or abetting)
8) Indulging in behaviour that tends to degrade the personality of a student, example, hair cutting as punishment, cutting skirt to size, etc.
9) Failure to perform duty as house master and not keeping appropriate house records.
10) Indecent dressing
11) Contributing to the delinquency of a minor
12) Deliberate negligence of duty
13) Beating or punishing students in disregard to rule and regulations for punishment.
14) Stealing of school property example; stencils, stationary, type writer, stop watches, microscope, etc.
15) Fighting with colleague or student
16) Rudeness or insubordination to the principal or his representative.
17) Corruption or fraudulent practices e.g., collecting illegal dues from students, embezzlement of school fees, etc.
18) Failure to keep records of tests and examinations.
19) Failure to mark class register-as form teacher
20) Aiding students in destabilizing the peace and unity of the school.
21) Forgery of certificates and other personal documents; giving false information.
22) Engaging in activities or crimes that will jeopardize or bring disrepute to the teaching profession or to the school.
23) Drinking alcohol while on duty or getting intoxicated to school
24) Smoking while on duty, particularly while teaching
25) Sleeping while on duty,

26) Leaking official and confidential documents to unauthorized persons.
27) Drug addition
28) Religious fanaticism
29) Male teachers flogging female student on the buttocks.
30) Going home before the normal closing hour
31) Falsification of accounts
32) Forging of transfer certificates or results of students.

A close look at the school system today discloses that most of these rules are being infringed upon. Consequently, the State Education Commission/Post Primary School Services Commission should device more stringent means of enforcing rules for better service delivery by teachers.

Teachers Professional Misconduct

Acts or offences specified as professional misconduct for teachers as found in the teachers' service manual (1990 p. 24) include;

1. Conviction for a felony or misdemeanor;
2. Conviction for an offence contrary to any provisions of the Education Law or any regulation made under the law;
3. In relation to an application to registration as a teacher, knowingly furnishing to the Registrar of teachers' information which is false;
4. In relation to an application for employment as a teacher;

a) Knowingly making statement which is false in a material particular;
b) With intent to defraud, failing to disclose to the employer any material information with his knowledge:

5. Having carnal knowledge of a child who is attending an institution at which the offending teacher is a member of staff;
6. known to be a pupil/student of a school;
7. Conduct prejudicial to the maintenance of order and discipline in an institution;
8. Conduct in respect of the staff or children in an institution which is disgraceful or dishonorable;

The revised Education law of Anambra State of Nigeria (1991) classified the professional misconduct for teachers to include the following;

1. Immorality with a school pupil;
2. Misappropriation of school funds
3. Dishonest conduct in relation to an examination
4. Supervision or falsification of school records or statistics,
5. Bribery, corruption, extortion in connection with school duties,
6. Teaching the children of his school outside for private gains;

7. Teaching the children of another school without the approval of the school board concerned.
8. Conduction of an illegal school whether as proprietor, manager or head teacher,
9. Continuing to teach in an illegal school after warning.

Since acts specified as professional misconduct varies from different schools and management boards, though could be similar in a number of ways, the Imo State Education (Miscellaneous provision) Edict No. 10 of 1988, sixth schedule, section 25 (2) (1)- (10) outlined ten acts constituting teachers professional misconduct as:

1. Immorality with a school pupil
2. misappropriation of school funds
3. dishonest conduct in relation to an examination
4. Suppression or falsification of school records or statistics.
5. Bribery, corruption or exploitation of children's services for personal ends.
6. Hours for private gain
7. Teaching the children of his school outside school hours for private income without official approval by the school management board.
8. Engaging in an illegal school, either as a proprietor, headmaster or teacher.
9. Engaging in any commercial activity or trade, including hawking of any ware during school hours.
10. Proven act of insubordination to immediate boss and consistent dereliction of duty.

It has also been observed that some teachers occasionally absent themselves for days or weeks without official permission. This infraction prompted the Federal Ministry of Education (FME) (1990) to stipulate in the teachers' service manual (5.2.55) that;

1. Any teacher who absents himself from duty without leave renders himself liable to be dismissed from the service and the onus will rest on him to exonerate himself otherwise he will face the consequences of such act/s . Frequent lateness to school will after three written warnings, render the teacher liable to similar penalty or the imposition of any lesser punishment appropriate to the offence.

ii. In every case of absence without leave, the teacher will receive no pay for the period of absence. All actions as taken in these cases must be reported to the State Schools Board and to the State Ministry of Education. Case of sudden illness where medical evidence is produced will not, for lack of prior notice alone, constitute a breach of the rules.

Political Activities

Whether on leave of absence or on duty, no teacher allows his political connection to affect the performance of his duties or in his relationship towards his colleagues or students. A teacher shall not engage in other remunerative activities except those related to his profession and which must receive the approval of the appropriate authority.

Duties

Every teacher is required to discharge the usual duties of the post to which he is appointed and any other duties considered as appropriate having regard to the appointment held by him, and which he may be called upon to perform. Willful disobedience of lawful instruction or refusal to serve in any locality within the state decided by the board will be regarded as misconduct punishable by summary dismissal. The law is therefore clear on what constitutes indiscipline among teachers and punishment due to such misconduct.

Punishment

Punishment for teachers' misconduct may come in the following ways;

i. Dismissal
ii. Removal on grounds of inefficiency
iii. Discharge on grounds of general unsuitability for further employment in the case of a person holding a non-established and non-punishable office.
iv. Reduction in rank
v. Reduction in salary
vi. Withholding of increment
vii. Deferment of increment
viii. Surcharge of increment
ix. Reprimand

Provided that nothing in this rule shall be constructed as limiting or otherwise affecting any powers to call upon a teacher to retire or any power to terminate the appointment of the holder of temporary appointment or to order that a teacher acting in a higher post with a view or his eventual promotion thereto, if he proves suitable, shall revert to his substantive appointment, or any powers to defer or withhold increments.

Types of Disciplinary Actions against Infracted Teacher

Section 10 of the teachers' handbook (Federal Ministry of Education, 1990, pp. 46-47) highlighted disciplinary measures that can be taken against any teacher involved in any act of misconduct. As already mentioned, the type of disciplinary action to be taken depends on the magnitude of the infraction. Such actions range from warning, outright dismissal or compulsory retirement.

i. Warning**:** Immediately the work or conduct of a teacher or officer is considered unsatisfactory he is served with a query and given time and opportunity to defend himself. If he fails to fully extricate himself from the allegation, he may be directed in writing to desist from such act of misconduct. Depending on the number of warning an officer has been given, he may lose his promotion to the next higher grade or may even be demoted or retired from the service.

ii. Interdiction**:** If a criminal charge has been laid against an officer and it is considered that in the public interest he should cease to exercise the powers and functions of his office instantly, he may be interdicted. When an officer is interdicted, he ceases to report for duty and receives such proportion of the emoluments of his offices, being not less than half, as will be determined.

iii. Suspension: Suspension is applied where a 'prima facte' case (the nature of which is serious) has been established against an officer and it is considered necessary in the public interest that he should forth with be prohibited from carrying on his duties. An officer on suspension ceases to receive his salary pending the time his case is fully investigated. If he is not found guilty, he is paid arrears of his salary not paid during his suspension.

iv. Termination**:** The appointment of an officer may be terminated, thus removing him from the service for grievous and flagrant misconduct. It may be affected by giving the office a month's or three months' notice of termination of appointment or payment of a month's salary in lieu thereof.

v. Dismissal: This disciplinary action may be recourse to when an officer is guilty of such flagrant infraction that goes to the root of his appointment and serves the nexus between employer and employee. When an officer is dismissed, no notice or salary in lieu thereof is to be given to him and his dismissal usually takes effect on the date on which he is notified. He therefore loses his gratuity and all pensions' rights.

vi. Compulsory Retirement**:** An officer may be retired from the service compulsorily as a disciplinary action where it is felt, as a result of misconduct, that he is no longer fit to be in the teaching service. Pension rights are not lost as a result of the retirement.

vii. Demotion: A teacher found guilty of misconduct, such as embezzlement of school fees, development fees, examination fees or collection of illegal school fees or development levies may be demoted in rank; reduction in status may also affect his salary in some cases. Demotion may take the form of reduction from the rank of a principal to that of a classroom teacher or that of a senior teacher to that of a lower status.

Teachers Right to Fair Hearing on Disciplinary Cases

In a situation where a case of professional misconduct is leveled against a teacher in such a way as to warrant disciplinary action, such a teacher must be given

an opportunity for fair hearing. The principle of fair hearing is a constitutional right specified by the various State Education Laws. Above all, it is one of the fundamental rights specified in chapter IV, 5.36(1) of the 2009 Federal Republic of Nigeria constitution (As amended), which states that:

> In the determination of his civil rights and obligations, including any question or determination by or against any government or author a person shall be entitled to a fair hearing within a reasonable time by a court or other tribunal established by law and constituted in such a manner as to cure its independence and impartiality.

In furtherance to the right of fair hearing before any severe disciplinary action is taken against a teacher, Section 36 (2) of the constitution, provides for an opportunity for the person whose rights and obligations may be affected to (a) make representation to the administering authority before that authority makes the decision affecting that person.

c) Contains no provision making the determination of the administering authority final and inconclusive. The right to fair hearing operates on the principle that any teacher charged with severe disciplinary case warranting serious disciplinary measure is presumed to be innocent until he is proved guilty. In such a situation as in a situation of criminal offence Section 36 still provides that such a person;

    a) be informed promptly in the language that he understands and in detail of the nature of the offence.
    b) be given adequate time and facilities for the preparation of his offence,
    c) defend himself in person or by legal practitioners of his own choice.

The whole idea of the principle of fair hearing is to be certain that justice is not only done but must be seen to have been done. It is pertinent to observe here that the principle of fair hearing is God's injunction which took its origin from the bible. In the book of Genesis 3:10-13, after Adam and Eve had eaten the "forbidden fruit", God did not condemn them until they were given ample opportunity through fair hearing to defend themselves. Punishment was pronounced by God to Adam and Eve when the defense they offered as to why they ate the forbidden fruit was unsatisfactory to God. It is therefore imperative that in any case of allegation of serious misconduct against a teacher, that teacher must be given an ample opportunity to defend himself/herself. Supporting this stance, Peretomode (2001) elucidated that if the right of fair hearing (substantive and procedural due process) is violated, any decision or punishment apportioned against the accused teacher would be seen as neglecting the principle of natural justice and therefore be declared null and void and of no consequence.

The crux of the matter is that any accused teacher must be given the opportunity to be heard. This principle is also substantiated in Acts of the Apostles, chapter 25, verse 16. Here Paul was remanded in prison custody but Festus in explaining Paul's case to King Agrippa and the wife Bernice, stated that it was not in the custom of Romans to condemn an accused until he was heard.

Verses 14-16 as submitted by Festus states,

> But I told them that we Romans are not in the habit of handing over any man accused of a crime before he has met his accuser face to face and has had the choice of defending himself against the accusation.

It is therefore right to say that fair hearing in respect of teachers in Nigeria is not only a prerequisite requirement of a common law but it is also a statutory and a constitutional requirement. In line with the position of Peretomode (2001), fair hearing implies that;

a) A person knows what the allegations against him are;
b) What evidence has been given in support of such allegations;
c) What statements have been made concerning those allegations?;
d) Such a person has a fair opportunity to correct and contradict such evidence;
e) The body investigating the charge against such a person must not receive evidence behind his back. The court has a duty once it is seized with the determination of the civil rights and obligations of any persons to be guided by the principles of fair hearing.

In view of these discussions, it becomes quite reasonable that no teacher should be punished based on any allegation of misconduct without being heard.

However, the schools management in order to achieve her aim of maintaining discipline among staff and students should always follow the guidelines for teachers' discipline and control as contained in the various education laws which has also made provision for fair hearing of teachers accused of professional misconduct. It is in this line that the TRCN established teachers' tribunal to investigate and try cases of teachers' in disciplinary actions.

Disciplinary Committee and Disciplinary Procedures:

The teachers' registration council of Nigeria (TRCN) established by decree No. 31 of 1993 and charged with the responsibility of regulating and controlling entry into the teaching profession in all aspects and ramifications established teacher's code of conduct. This was to avoid any teacher claiming ignorance of what constitutes

misconduct in the discharge of his/her duty. In the light of this, the council exercises its disciplinary functions on serving teachers through the;

i) Teachers investigation panel (TIP) and
ii) Teachers disciplinary committee (TDC)

Teachers Investigation Panel (TIP)

No 31 Section 9 of the Act established teachers' investigation panel which shall be set up in all the states of the federation and the Federal Capital Territory. The panel according to the Act is appointed by the governing council in consultation with state ministries and department of Education, Federal Capital Territory. It shall be made up of five members one of whom shall be a legal practitioner.

In section 11 (1) of the Act, it was made compulsory that the heads of all educational institutions should report any case of breach of professional conducts and standards by a registered teacher. Failure of the head to make such a report when the breach has been committed, constitutes an offence against that head punishable by the law court with "a fine of one thousand naira (N1,000.00)'' or imprisonment for a term of three months. Other stakeholders of the educational institutions (parents, colleagues, students and the general public) are also empowered to report any case of breach of professional conduct by a teacher to the panel.

The procedures to be adopted by the teachers' investigation panel in making inquiry into allegation of professional misconduct with the intent to dismiss or terminate or demote a teacher include;

i) Conducting a preliminary investigation into any case where it is alleged that a member has misbehaved in his capacity as a teacher;
ii) The teacher so affected shall be informed by the panel that an allegation has been made against him shall be invited to respond to it.
iii) Where the panel establishes evidence of misconduct it shall refer the case to the teachers' disciplinary committee.

Teachers Disciplinary Committee (TDC)

A provision for the existence of teachers' disciplinary committee (TDC) was made in section 9 of the TRCN Act. It stipulates that the committee shall comprise the chairman of the governing council and ten other members appointed by the council. The major responsibility of TDC is to consider the cases referred to it by the teachers' investigation panel. In accordance with section, 10 (1) of the TRCN Act 31 of 1993, grounds that will make a professional teacher liable for prosecution are where;

a) A teacher is judged by the tribunal to be guilty of infamous conduct in any professional respect, or

b) A teacher is convicted, by an court or committee in Nigeria or elsewhere having power to award imprisonment of an offence (whether or not punishable with imprisonment which in the opinion of the tribunal is incompatible with the status of a teacher, or
c) The tribunal is satisfied that the name of any person has been fraudulently registered or a member has made false claims in his registration documents.

If a teacher is convicted on any of the offences so stated, the committee reserves the right to direct as here under;

i) Advice
ii) Reprimand
iii) Suspension of registration
iv) Cancellation of registration
v) Criminal prosecution in accordance with the relevant laws of the country.

However, convicted teachers who are aggrieved are empowered by section 10 (4) of the Act to make appeal within twenty eight days of conviction to the High Court of Appeal against the decision taken by TDC. Here, TDC stands as respondent to the appeal thereby sharing the same power as a High Court. By all standards therefore, the committee according to the Act is a tribunal or jury whose rights and privileges should not be trifled upon by workers. It shares the same formation as the medical tribunal set up by the medical and dental council of Nigeria to try erring doctors. Same with legal counsel of Nigeria set up to try erring lawyers.

Compensation for Teachers Injury

In any situation where the teacher is wrongfully and unjustly punished through termination of appointment, interdiction, dismissal or any other severe punishment as prescribed by the education law, there must be a remedy to the teacher. The remedy depends on the type of injury the teacher is meant to suffer or any one already suffered. Agreeing with this, Nwangwu in Obi (2004) highlighted damages the court may award to the unlawfully accused teachers as;

i. Cost of prosecuting his case in court including the cost of hiring lawyers, obtaining photocopies of documents etc.
ii. Financial damages for his loss of the opportunity to remain in continuous employment.
iii. Monitory damages for loss of status, prestige or reputation in his profession following the charges leveled against him.
iv. Financial damages for the frustration, physical and mental suffering to which the affected teacher was subjected by his employer's action. Punitive damages

may also be awarded where the court found the wrongful action of the employer to be as a result of malice and bad faith.

Conclusion

This paper x-rayed the concept of discipline and punishment that are incurred by teachers on infringement related to the offence. Attention was also given to areas of infraction by teachers, teachers' professional misconduct including absence without leave and political activities that may endanger the demands of the profession. Further attempt was made to x-ray types of disciplinary sanctions against infracted teachers and teacher's right to fair hearing. The procedure for handling disciplinary cases as outlined by the teachers' registration council of Nigeria and compensation for teachers' injury formed part of this paper.

Recommendation

Given the above, it is recommended that the various agencies responsible for maintaining and enforcing discipline in the school system should brace up and live up-to expectations, such agencies like the Federal Ministry of Education, post primary schools services commission (PPSSC), school administrators among others should have a closer look at the public outcry of obvious misconduct of teachers and follow due process in handling them.

Teachers should also appreciate the fact that discipline is a fundamental principle of school improvement and aim at either developing it or acquiring it for effective teaching and learning in all the strata of Nigeria educational system.

References

Ezeugbor, C. O. (2014). The administrative process. In Glad O. Unachukwu and Pertua N. Okorji (Eds). *Educational management: A skill building approach* pp 35-56. Nimo Rex Charles & Patrick Limited.

Federal Ministry of Education. (1990). N*igeria teachers' service manual*. Lagos: Federal Ministry of Education.

Federal Republic of Nigeria (2011). *Constitution of the federal Republic of Nigeria (as amended) with the national industrial court.* Lagos: Ministry of Information.

Good News Bible (1976). Genesis; Chapter 3: 10-13, Acts of the Apostles, Chapter 25:14-16.

Nwosu, E.E. & Modebelu, M.N. (2016). Concept of educational administration and education management. In Melody Ndidi Modebelu, Lawrence Okwudili Eya & Joy Chinwe Obunadike. (Eds) *Educational management: The Nigerian perspective, pp. 10-10 Awka: SCOA Heritage.*

Obi, E. (2004). *Law and education management*. Enugu; Empathy International.

Onyali, L. C. (2014). School discipline. In Glad O. Unachukwu & Perpetua N. Okorji (Eds) Educational management: A skill building approach. pp.231-251., Nimo: Rex Charles & Patrick limited.

Peretomode (2001). *Education law; Principles, cases and materials on Schools.* Owerri, International University Press.

Teachers Registration Council of Nigeria (2005). *Teachers code of conduct*. Abuja; Teachers Registration Council of Nigeria.

Teachers Registration Council of Nigeria (2010). *Professional standards for Nigerian teachers.* Abuja; Teachers Registration Council of Nigeria.

The free dictionary.com.www. the freedicationary. Retrieved, June 20, 2014.