

Introduction

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Flower Power

16 July 1967. Nearly three years after the Tonkin Gulf Incident, the Vietnam War is in full, bloody progress. Race riots are taking place across the United States. A civil war has begun in Cambodia that will culminate in the Killing Fields of the Khmer Rouge. A month previously, the Six-Day War concluded with Israel occupying the West Bank, Gaza Strip, Sinai Peninsula and Golan Heights. The UK has entered the first-round negotiations for entry into the European Economic Community: internal opposition to its membership will be unrelenting until the divisive Brexit referendum of 2016, and beyond. Nine executives of the German pharmaceutical company Grunenthal, manufacturers of thalidomide, face criminal charges: the birth defects caused by the drug, sold over-the-counter for morning sickness, will affect some ten thousand babies worldwide. The wreck of the supertanker SS *Torrey Canyon* off the southwest coast of England in March – still the UK's worst oil spill – has caused environmental damage that will last for decades.

It is also the Summer of Love. Tens of thousands of young people are converging on the Haight-Ashbury district of San Francisco, organising musical and artistic events, Be-Ins, a Free Store and a Free Clinic. The US Supreme Court has declared all state laws banning interracial marriage unconstitutional. The first batch of LSD has been made. This year, The Doors have released their debut album, *The Doors*, featuring the breakthrough single 'Light My Fire'. Performing live on the Ed Sullivan Show in September, the lead singer, Jim Morrison, disobeys instructions not to sing the line 'girl, we couldn't get much higher' – the band is not invited back. But it is the Beatles' *Sgt. Pepper's Lonely Hearts Club Band* that occupies the number one spot in the UK and US album charts all summer. Early in July, the UK decriminalises homosexual acts between consenting males above the age of 21. Later, in the autumn, in all parts of the UK

except Northern Ireland, the abortion of foetuses of up to twenty-four weeks' gestation will be legalised.

What takes place on 16 July in London is just a tiny piece of this political, social and cultural mosaic. Several hundred young people, dressed in multi-coloured clothes, fill Hyde Park. Their faces painted, they blow bubbles, burn incense and tinkle the little bells they are wearing around their necks. From time to time, they throw flowers at the police who are in attendance. This is Flower Power, and it has arrived in Britain. The idea, if not the phrase, was Allen Ginsberg's, who, in a 1965 handbill published by the radical *Berkeley Barb*, recommended as a tool of protest 'Masses of flowers – a visual spectacle – especially concentrated in the front lines. Can be used to set up barricades, to present to Hell's Angels [who opposed resistance to the Vietnam draft], Police, Politicians.'¹ Flowers as metaphors, flowers as markers: the natural, organic, colourful, delicate, ephemeral and cyclical contrasting with the man-made, mechanistic, monochrome, tough, durable and linear. The young people in Hyde Park are there to demonstrate peacefully in support of the legalisation of cannabis. As *The Times* reports, these 'so called "flower children"' sit on the grass in the sunshine and preach 'the "hippy" philosophy of absolute love, gentleness, and kindness, to astonished strollers'.²

Writing three years later, in 1970, the American historian Theodore Roszak coined a term for the motivating force behind such events: the 'counterculture'. When an industrial society reaches its peak, Roszak theorised, a 'technocracy' – a form of totalitarianism – is born.³ Confronted by 'bewildering bigness and complexity', obliged to 'defer on all matters to those who know better', the citizen of the technocracy has only one recourse.⁴ 'Imagination is seizing power', Roszak declared, likening the coup to Shelley's invocation of 'light and fire from those eternal regions where the owl-winged faculty of calculation dare not ever soar'.⁵ The Legalise Pot Rally in Hyde Park had all the ingredients: anti-authoritarianism, innovation and imaginative flair. The same potent mixture, as variously expressed in British poetry, fiction and drama of the years from 1960 to 1980, is the subject of this volume.

¹ Allen Ginsberg, 'Demonstration or Spectacle as Example, as Communication', single-page handbill published by the *Berkeley Barb* (19 November 1965).

² Stephen Jessel, 'Drugs Call by "Flower Children"', *The Times* (17 July 1967), p. 2.

³ Theodore Roszak, *The Making of a Counter Culture: Reflections on the Technocratic Society and Its Youthful Opposition* (London: Faber, 1968), pp. 4, 9.

⁴ *Ibid.*, p. 5. ⁵ *Ibid.*, pp. 22, 55. The quotation is from Shelley's *A Defence of Poetry* (1821).

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But ‘Flower’ is not only the subversion of ‘Power’. Although, during the two decades, both an unofficial counterculture and an established liberal politics co-existed with and constantly undermined a massive military-industrial complex (the term became famous after its use by Eisenhower in his farewell presidential address in 1961), it is important to remember that ‘Flower’ was powerful in its own right. The absence of forward slash or hyphen in this volume’s subtitle, an absence which can be read as suggesting that ‘Flower’ and ‘Power’ are interchangeable, is a tribute to this. ‘Flower’, here, is shorthand, not only for the hippy movement, but also for all the modish manifestations of anti-Establishment *éclat* and doing-things-differently across the period. On this spectrum lie, for example, the anti-psychiatry movement of R. D. Laing and David Cooper; the psychedelic drug therapy of Timothy Leary; the anti-consumerism of Herbert Marcuse; the educational theories of Paul Goodman;⁶ and the late theological simplicity of Thomas Merton – as well as Mary Quant’s mini-skirts and hot pants; Vidal Sassoon’s five-point bob; Zandra Rhodes’s conceptual chic; the Looks of Twiggy and Jean Shrimpton; Swinging London (Carnaby Street, the King’s Road, the Fulham Road); the Mods and the Rockers; *Oz* magazine and *That Was The Week That Was*; Cuban heels, winkle-pickers and platform shoes; bell-bottoms and tie-dye; Pop Art and punk. All these – and they are only a few examples – were groundbreaking innovations in the look, feel and thought of the period with enormous impact and lasting legacies. (Not a few of them depended on the capitalist economic structures they ostensibly deprecated, a point which Eileen Pollard and Berthold Schoene expand upon in their Introduction to the fifth volume in this series.)⁷ Looking back on it all, the feminist Sheila Rowbotham pithily termed it ‘an alternative way to be which was no longer simply marginal’.⁸

The subtitle *Flower Power*, too, highlights one of the most important, and often neglected, developments of the years from 1960 to 1980: growing

⁶ See Patricia Waugh, *Harvest of the Sixties: English Literature and its Background 1960 to 1990* (Oxford: Oxford University Press, 1995), pp. 5–6.

⁷ Pollard and Schoene cite Tony Judt and David Harvey’s arguments that the roots of the neoliberalism ascendant in the 1980s lie in the 1960s counterculture. ‘What united the ‘60s generation was not the interest of all, but the needs and rights of each’, wrote Judt. ‘Doing “your own thing”, “letting it all hang out”, “making love, not war”: these are . . . of their essence private objectives, not public goods’ (*Ill Fares the Land: A Treatise on Our Present Discontents* (London: Allen Lane, 2010), pp. 87–8). For Harvey, counterculture emphasis on individual autonomy swiftly mutated into belief in ‘the liberty of consumer choice’ (*A Brief History of Neoliberalism* (Oxford: Oxford University Press, 2005), p. 23).

⁸ Sheila Rowbotham, *Promise of a Dream: Remembering the Sixties* (London: Allen Lane, 2001), p. 115.

environmental awareness, stimulated in America by the publication of Rachel Carson's *Silent Spring* in 1962 and in Britain by the conservationist Derek Ratcliffe's lesser known work on the peregrine falcon.⁹ And the title also underlines the commitment of this volume to the regional, the local and the small-scale: the antidote to the 'bewildering bigness' Roszak identified. 'In a time of global concepts', wrote Philip Larkin in a 1959 essay on John Betjeman, '[he] insisted on the little, the forgotten, the obscure: the privately-printed book of poems, the chapel behind the Corn Exchange, the local landscapes in the Museum (open weekdays 2 p.m. – 4 p.m.), and slowly our tastes have begun to turn his way.'¹⁰ History – and literary history – is not just a matter of large-scale political events and social changes but also the product of under-currents and ripples; dwindlings, blendings and frail beginnings; absorptions, pauses and mistakes. It is this sense of transition that this volume hopes to encapsulate, revealing and illuminating nuanced and often overlooked literary developments in the twenty years it covers. This is *Flower Power* in the sense of little efflorescences, buddings and blossomings, creepings and climbings, graftings, witherings and re-growth.

1960 to 1980

But first, the bigger picture. History, including literary history, has an annoying habit of refusing to be mapped neatly onto the beginnings and ends of blocks of chronological time: millennia, centuries, decades. Trying to coax, let alone force, it to do so has obvious pitfalls. One is the distortion created by the idea of a 'radical break' with what has gone before and comes afterwards; another is a patronising insinuation of progress.¹¹ So, while 1960 has been plausibly described as a 'threshold . . . in popular consciousness at least' and 1979, with reason, as 'the breakdown of a distinct phase in British post-war politics', there is also justification for seeing these as ragged tears in the fabric of time rather than clean incisions.¹² The years

⁹ Derek Ratcliffe, 'The Status of the Peregrine in Great Britain', *Bird Study* 10 (1963), 56–90.

¹⁰ Philip Larkin, 'Betjeman En Bloc', *Further Requirements: Interviews, Broadcasts, Statements and Book Reviews*, ed. Anthony Thwaite (London: Faber & Faber, 2001), 206–16: p. 207.

¹¹ On these historiographical models, see Michael Ball, Fred Gray and Linda McDowell, 'The Transformation of Britain?', *The Transformation of Britain: Contemporary Social and Economic Change*, ed. Michael Ball, Fred Gray and Linda McDowell (London: Fontana, 1989), 1–5: p. 4.

¹² Waugh, *Harvest of the Sixties*, p. 1; Nick Hubble, John McLeod and Philip Tew, 'Introduction: Britain in the 1970s – Controversies and Cultures', *The 1970s: A Decade of Contemporary British Fiction*, ed. Nick Hubble, John McLeod and Philip Tew (London: Bloomsbury, 2014), 1–13: p. 8.

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1956–79, for example, would have been just as plausible a period, book-ended by John Osborne's *Look Back in Anger* and the inception of the Thatcher government.¹³ Nonetheless, twenty years does give us a manageable panorama – more elbow-room than a decade, closer focus than a century – and my aim here is to give an overview of the international and national events that flavour the British literary creations of the period.

It was a geopolitics dominated by the Cold War (which often flared into hot war): the Bay of Pigs invasion in 1961 and the Cuban Missile Crisis the following year; the building of the Berlin Wall in 1961; the ongoing war in Vietnam (ending in 1973); the CIA-sponsored coup in Chile that brought Augusto Pinochet to power in 1973; the Soviet invasions of Czechoslovakia in 1968 and Afghanistan in 1979; the emergence in Poland, in 1980, of the trade union Solidarity. Tim Armstrong has identified a 'pulse of catastrophic violence' running through the 1970s in particular, citing the mass killings by Idi Amin in Uganda, the Khmer Rouge, the terrorism of the IRA and the Red Army, the Jonestown massacre and the wars in Biafra, Angola, Israel, Cyprus, Nicaragua, Afghanistan and elsewhere.¹⁴ The fear of nuclear annihilation already noted in the *Postwar* volume remained very real. 'The overriding issue of our time', said Cecil Day Lewis in 1962, 'is whether civilization will destroy itself, instantaneously with hydrogen bombs.'¹⁵

In the UK, Keynesian economics and the Welfare State had established relative prosperity and stability in the decades immediately following the Second World War. Much was undone in the global and national financial crises of the 1960s and 1970s: the so-called 'Kennedy Slide' of 1961–2; the credit crunch of 1966; and, following the embargo placed on oil sales to the United States, Britain, Canada, Japan and the Netherlands by OPEC countries after American support for Israel in the Yom Kippur War, the oil crisis of 1973. This last caused a worldwide recession. In Britain, with inflation at 23 per cent, the Heath government curbed public sector pay rises and, anticipating a strike by mineworkers, limited commercial consumption of electricity by imposing a three-day week. The crisis continued into 1974, with the new prime minister Harold Wilson calling a state of emergency. Unemployment in Britain passed two million in

¹³ On the significance of the former, see Trevor R. Griffiths, 'Drama and the New Theatre Companies', *The Cambridge History of Twentieth Century English Literature*, ed. Laura Marcus and Peter Nicholls (Cambridge: Cambridge University Press, 2008), 494–509.

¹⁴ Tim Armstrong, 'The Seventies and the Cult of Culture', *The Cambridge History of Twentieth Century English Literature*, ed. Marcus and Nicholls, 583–99: p. 584.

¹⁵ 'Context', *The London Magazine* 1.11 (February 1962), 27–53: p. 30.

1975 and industrial action culminated in the Winter of Discontent in 1978. It was in this context that, campaigning on the Saatchi & Saatchi-created slogan ‘Labour Isn’t Working’, Margaret Thatcher’s Conservative government swept to power in May 1979. ‘We are reaping what was sown in the Sixties’, Thatcher said in 1982. ‘The fashionable theories and permissive claptrap set the scene for a society in which the old virtues of discipline and self restraint were denigrated.’¹⁶

‘Permissive claptrap’ would no doubt have included the abolition of capital punishment, which took place in 1965, and the legalisation in 1967 of abortion and homosexual sex, and the 1969 Divorce Reform Act, which allowed couples to divorce on the grounds of irretrievable marital breakdown. ‘Fashionable theories’ would probably have been those leading to the expansion of higher education (the Robbins Report of 1963), the raising of the school-leaving age to 16 in 1972 and the passing of the Sex Discrimination and Equal Pay Acts in 1975 and the Race Relations Act in 1976. And Thatcher might have applied both descriptors to the announcement by the then minister of health Enoch Powell in the House of Commons on 4 December 1961 that the contraceptive pill was henceforth to be available on the NHS.¹⁷ ‘Now the wraps were off’, wrote Clive James in his memoir *May Week Was In June* (1990): ‘If you looked closely enough at the pill, it glowed with a green light.’¹⁸

Casual sex wasn’t the only activity to get the go-ahead. The early beneficiaries of the 1944 Education Act, also known as the Butler Act, which guaranteed free state education until the age of 15, were entering maturity. Comprehensive education, introduced in 1965 by the Labour government, expanded massively, so that by 1975 about 90 per cent of all state-funded schools in England and virtually all those in Scotland and Wales were comprehensives.¹⁹ Over twenty new ‘plate-glass’ universities were established in Britain in the 1960s, and in 1971 the Open University went into operation. These greater educational opportunities led to what Steven Connor calls ‘a decisive shift in cultural power and authority’.²⁰ In her autobiography *Bad Blood* (2000), Lorna Sage, who went on to become professor of English Literature at one of those plate-glass

¹⁶ Adam Raphael, ‘Thatcher: Success is Around the Corner’, *The Guardian* (28 March 1982), p. 1; also quoted in Waugh, *Harvest of the Sixties*, p. 18.

¹⁷ Family planning clinics were allowed to prescribe the pill, free, to single women in 1974.

¹⁸ Clive James, *May Week Was In June* (London: Picador, 1990/1991), p. 86.

¹⁹ www.timeshighereducation.com/news/comprehensive-schools-the-history/92186.article (accessed 5 May 2016). The first comprehensive schools in Britain, designed to offer free, non-selective secondary education, were set up after the Second World War.

²⁰ Steven Connor, *The English Novel in History 1950–1995* (London: Routledge, 1996), p. 46.

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universities – East Anglia – tells the story of how, pregnant at 15, she was allowed to read English on a scholarship at Durham after the university changed its rules on allowing married women to study. The (female) warden of St Aidan's College took 'a no-nonsense view of my offence', remembers Sage:

In future St Aidan's wouldn't be sending women students down for anything other than intellectual shortcomings. She had set a dangerous precedent, but she took it in her stride, only warning me against the mind-rotting side effects of the washing-up that she'd heard living with a man involved.²¹

But a working-class optimism created by these opportunities and the relative affluence of the 1960s became, in the deindustrialised 1970s, tinged by discontent and fear.

'It is the seventies which sees the flowering of identity politics', writes Armstrong, but, as Sage's example shows, the seeds were already germinating in the previous decade.²² '[T]he scale of women's access to literary life has reflected and accelerated democratic, diasporic pressures in the modern world', Sage herself remarked in her preface to *The Cambridge Guide to Women's Writing in English* (1999), and something of that scale during the 1960s and 1970s can be illustrated by the titles published in the period.²³ These included Simone de Beauvoir's *The Second Sex* (British publication 1961), Betty Friedan's *The Feminine Mystique* (1963), Juliet Mitchell's 'Women: The Longest Revolution' (1966), Mary Ellmann's *Thinking About Women* (1968), Gloria Steinem's 'After Black Power, Women's Liberation' (1969), Kate Millett's *Sexual Politics* (1970), Shulamith Firestone's *The Dialectic of Sex* (1970) and Germaine Greer's *The Female Eunuch* (1970). Mitchell's essay, published in the *New Left Review*, is an early British example of the thinking that became, later in the 1960s, Second Wave feminism. '[W]omen are offered a universe of their own: the family', wrote Mitchell. 'Like woman herself, the family appears as a natural object, but it is actually a cultural creation.'²⁴ Progress was tricky but Mitchell noted some things that could help: the automation of production, women's education, contraception ('an innovation of world-historic importance') and the absorption of the nuclear family in wider

²¹ Lorna Sage, *Bad Blood: A Memoir* (London: Fourth Estate, 2000/2001), p. 275.

²² Armstrong, 'The Seventies and the Cult of Culture', p. 594.

²³ Lorna Sage, 'Preface', *The Cambridge Guide to Women's Writing in English*, ed. Lorna Sage with Germaine Greer and Elaine Showalter (Cambridge: Cambridge University Press, 1999), v–vii: p. v.

²⁴ Juliet Mitchell, 'Women: The Longest Revolution', *New Left Review* 1.40 (November–December 1966), 11–37: p. 11.

community structures.²⁵ When Mary Quant, remembering the 1960s, commented that ‘Vidal Sassoon, the Pill and the mini-skirt changed everything’, she was getting at more or less the same ideas.²⁶

The point that identity politics are intersectional was not lost on Mitchell. In theory, the permissive society could, she noted, lead to ‘true inter-sexual freedom’.²⁷ Yet sex still led to women taking on the traditional responsibilities of motherhood. At the same time as lauding contraception, Mitchell therefore also hailed the legalisation of homosexual acts as they were a form of ‘non-reproductive sexuality’.²⁸ Decriminalisation of gay sex was lobbied for in Britain by the Homosexual Law Reform Society (HLRS), founded in 1958, whose members included Stephen Spender and Victor Gollancz, and the Campaign for Homosexual Equality, founded in 1964, which grew out of the North Western HLRS. At least partial success was achieved on 27 July 1967 – eleven days after the Hyde Park rally – when sex between consenting males over 21 in private ceased to be a criminal offence in England and Wales. This was ten years after the Wolfenden Report had recommended decriminalisation, and it took until 1 February 1981 and 8 December 1982 respectively for Scotland and Northern Ireland to follow suit. The tension-ridden attempts to uphold heteronormativity and the nuclear family described in the *Postwar* volume looked increasingly desperate. But, despite these forward strides in gay rights, many gay people in the 1960s and 1970s still felt obliged to conceal their sexuality. The church historian Diarmaid MacCulloch, born in 1951, makes something of a virtue of the constraints. In the Britain of the 1960s, he notes, ‘gay teenagers were keenly aware of what could not be said; of when to be silent and of how to convey messages in other ways’.²⁹ This training in non-verbal communication and perception was a ‘great blessing for a young historian’.³⁰ MacCulloch’s gayness also equipped him with another of the historian’s ‘essential qualit[ies]’: the ‘sense of distance’ arising from his ‘observer status in the rituals constructed for a heterosexual society in a world which in reality was not quite like that’.³¹

Gay and lesbian people were not the only ones experiencing ‘distance’. With shortages in the labour market after the Second World War, the British government had begun to encourage mass immigration from former Empire and Commonwealth countries. The 1948 British Nationality Act conferred British citizenship on all Commonwealth subjects and

²⁵ Ibid., p. 21. ²⁶ Mary Quant, *My Autobiography* (London: Hachette, 2012), p. 169.

²⁷ Mitchell, ‘Women: The Longest Revolution’, p. 32. ²⁸ Ibid., p. 36.

²⁹ Diarmaid MacCulloch, *Silence: A Christian History* (London: Allen Lane, 2013), p. 3.

³⁰ Ibid., p. 3. ³¹ Ibid., p. 3.

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recognised their rights of entry to and settlement in Britain. Waves of immigration from Africa, India and Pakistan followed, peaking just before the Commonwealth Immigrants Act of 1962 severely curbed the rights conferred in 1948. The anti-immigration sentiments behind this Act culminated in the notorious ‘Rivers of Blood’ speech delivered by Enoch Powell, by this time shadow defence secretary, to a Conservative Association meeting in Birmingham on 20 April 1968. Powell was dismissed from the Shadow Cabinet for his inflammatory remarks and the anti-discriminatory Race Relations Acts of 1965 and 1968 were consolidated into the Race Relations Act of 1976. This Act established the Commission for Racial Equality. But, despite these advances, tensions remained. Being an immigrant in Britain in the 1960s and 1970s could feel, to quote the cultural theorist Stuart Hall, like being in ‘suspended animation’.³² Noting the curiously artificial poses in the ‘high-street’ photo-portraits that West Indian immigrants had taken of themselves in the early 1960s, Hall nonetheless refuses to accept them as ‘the victims of migration’.³³ For ‘[a]lready, there is *style*’.³⁴ A hat’s jaunty angle might be slim evidence of an anti-establishment attitude and imaginative flair but it lies on the same continuum as other flowerings of black power in the period, such as the founding of the Brixton Black Women’s Group in 1973, the Organization of Women of Asian and African Descent in 1978 and the Southall Black Sisters in 1979.

If immigration and decolonisation caused a transition in British identity in the period, so too did developments in the home nations. In response to sectarian rioting in 1969, the British Army was deployed in Northern Ireland. Internment without trial followed, and in 1972 Prime Minister Edward Heath suspended the unionist-controlled Stormont parliament and introduced direct rule. Attempts in 1975 to initiate a peace process failed, and the Troubles would continue until the Good Friday Agreement of 1998. Scottish and Welsh devolution entered the political agenda when James Callaghan’s government, which had an un-workable majority of only three seats, was forced into a deal with the Scottish National Party and Plaid Cymru. In return for voting support on other matters, Labour promised to introduce legislation devolving power from London to Edinburgh and Cardiff. The Scotland Act and the Wales Act were passed in 1978, and in 1979 the electorates of those countries were asked if they

³² Stuart Hall, ‘Reconstruction Work: Images of Postwar Black Settlement’, first printed in *Ten-8* 16 (1984), pp. 2–9; reprinted in *The Everyday Life Reader*, ed. Ben Highmore (London: Routledge, 2002), 251–61: p. 253.

³³ *Ibid.*, p. 255. ³⁴ *Ibid.*, p. 255.

should be put into effect. Scotland voted in favour of devolution, but the figure was below the necessary 40 per cent of the total electorate. Wales voted decisively against. The Union remained intact for the present but, as Tom Nairn explained in his influential book *The Break-Up of Britain* (1977), the writing was on the wall.

From the *Lady Chatterley* Trial to the Murder of John Lennon

Having sketched some of the key political, economic and social developments of the 1960s and 1970s, I want now to highlight some cultural and attitudinal shifts. The perfect starting-point is *R v Penguin Books Ltd*, otherwise known as the *Lady Chatterley* trial, which took place towards the end of the first year of our period, 1960. Penguin was prosecuted under the Obscene Publications Act 1959 for publishing the unexpurgated version of D. H. Lawrence's 1928 novel. On the first day of the trial at the Old Bailey, the prosecuting barrister, Mervyn Griffith-Jones, explained to the court why the book should be viewed as obscene and, further, why publication could not be justified in the public good. Griffith-Jones left the jury, which comprised nine men and three women, with some questions which have become notorious for defining the paternalistic attitudes current at the time of the trial:

Would you approve of your young sons and daughters – because girls can read as well as boys – reading this book? Is it a book you would have lying around in your own house? Is it a book you would even wish your wife or your servants to read?³⁵

If the assumptions here were not already out of touch, they soon would be. Opening for the defence, Gerald Gardiner QC took the line that Lawrence had believed that '[o]ne of the greatest things' was 'the relationship of a man and woman in love'.³⁶

[T]heir physical union formed an essential part of a relationship which was normal and wholesome and not something to be ashamed of, but something to be discussed openly and frankly.³⁷

A negative, fear-inflected, repressive view of sex and the ways of expressing it versus a permissive, celebratory, euphemism-scorning view. The trial continued for six days. The jury unanimously found Penguin not guilty

³⁵ 'Sensuality Commended Almost As A Virtue – Prosecution', *The Times* (21 October 1960), p. 4.

³⁶ Ibid. ³⁷ Ibid.