The Role of Epistemic Values in Philosophical Counselling

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Abstract: In this paper, I will argue that the effectiveness of philosophical counselling as a therapeutic practice lies in the intentional cultivation of epistemic values within the client-practitioner relationship. At its heart, this process involves creating a space where truth-seeking is not merely an intellectual pursuit but a shared commitment—a collaborative journey marked by courage, curiosity, and compassion. When practitioners nurture this commitment, they go beyond facilitating dialogue; they guide clients toward a deeper appreciation of the values that form the foundation of genuine understanding and personal growth.

Key-words: philosophical counselling; truth; applied philosophy; epistemic values; intellectual growth; wisdom; personal development;

What Is Philosophical Counselling?

Philosophical counselling, as it is practiced today, is a dynamic and evolving field that defies precise boundaries. Its inherent diversity of approaches often leads some to describe it as eclecticⁱ, which reflects philosophy's own rich and varied nature. Philosophy, after all, resists confinement to a singular definition, thriving instead on its capacity to

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explore an expansive array of questions, methods, and traditions. It is unsurprising, then, that philosophical counselling inherits this characteristic pluralism. However, since its emergence as a distinct therapeutic and counselling practice in the late 20th century, philosophical counselling has been the subject of numerous characterizations and definitions, each attempting to illuminate its central features and distinguishing qualities. These efforts, though insightful, often capture only fragments of its essence, highlighting its complexity and dynamic nature as a counselling practice.

In this still ongoing quest to articulate the essence of philosophical counselling, I think Ran Lahav's definition of it as a "pursuit of wisdom"ii continues to resonate deeply. This characterization, although grounded in the traditional lexicon of philosophy and marked by the inherent ambiguity of defining wisdom itself, offers a perspective that is both expansive and inclusive. It captures not only the diversity of methods and resources employed by philosophical practitioners but also the inherently interdisciplinary nature of their work. Wisdom, after all, cannot be confined to a single approach, nor can it be fully apprehended within the boundaries of any one discipline, whether philosophical or otherwise. Its pursuit demands a multiplicity of perspectives, reflecting the complexity and interconnectedness of life itself. Wisdom, by its very essence, resists such a straightforward categorization. Its elusive nature mirrors the profound intricacy of what philosophers have long referred to as human nature. If we conceive of wisdom, even loosely, as an understanding of ourselves as human beings and of the world we inhabit, then it becomes clear that its meaning is deeply contingent on who we are, both individually and collectively, and on the kinds of relationships we forge with the world around us. This interplay between wisdom and human nature—both of which are notoriously challenging to define—lies at the heart of philosophical inquiry and, by extension, philosophical counselling.

Perhaps it is precisely because of their complexity that discussions of wisdom and human nature have receded from the forefront of philosophical discourse in recent times. These concepts, once central to philosophical reflection, now appear too vast, too imprecise, or too entangled with subjective experience for systematic analysis. Yet in philosophical counselling, we are compelled to revisit these ideas, not as abstract intellectual exercises but as living questions that bear directly on

the challenges and aspirations of human existence. Here, the pursuit of wisdom becomes an active, experiential engagement—a process of grappling with profound questions through imperfect approximations, always aware that the answers we seek may be provisional, fragmented, or incomplete.

Truth and Wisdom: A Tale of Asymmetry

Now, at the heart of the quest for wisdom, however we may define it, lies a fundamental conviction in the inherent worth of seeking truth through inquiry. This conviction serves as a cornerstone of philosophy, grounding the intellectual pursuits of those who recognize and champion the value of truthiii as a guiding principle. In other words, for philosophers, truth is not merely an abstract ideal to be admired from a distance; it is an active and dynamic force, one that compels rigorous questioning, careful analysis, and thoughtful reflection. It is the gravitational center of their endeavors, shaping the trajectory of their journey toward deeper understanding. This belief in the intrinsic value of truth imbues philosophical inquiry with a sense of purpose and urgency. Philosophers embark on their explorations not out of mere curiosity but out of a profound commitment to uncovering insights that illuminate the nature of existence, reality, and the human condition. For them, truth-seeking is not something static or immutable; it is a living, evolving endeavor that requires courage, humility, and a willingness to confront the unknown. However, it could be argued that this deep drive toward truth is not confined solely to philosophers in their ivory tower, or to academia in general. Rather, it reflects a broader human inclination toward truthseeking, one that is influenced by a variety of factors. Some of these factors are practical and explicitly goal oriented. As Grimm observes, "our interest in finding out how things stand with respect to a particular subject—of finding out the truth with respect to that subject—is often motivated by our practical goals."iv At the same time, some of our motivation to seek the truth is not practical but rather theoretical or, more precisely, axiological. In Goldman's words, "truth acquisition is often desired and enjoyed for its own sake, not for ulterior ends. It would hardly be surprising, then, that intellectual norms should incorporate true belief as an autonomous value, quite apart from its contribution to biological or practical ends."v

Getting back to the relationship between truth and wisdom, I think it's safe to conclude that the pursuit of truth is inseparable from the pursuit of wisdom. But the relationship between them is asymmetrical: one can attain many truths without becoming wise, but it is impossible to be wise without possessing certain significant or essential truths. Throughout the history of Western thought, philosophers have best recognized this crucial asymmetry. They understand that genuine wisdom cannot exist without a sincere engagement with truth, regardless of how unsettling or disruptive that truth may be. To seek wisdom is to embrace the challenges that truth often presents—challenges that may unsettle long-held beliefs, upend entrenched paradigms, or demand uncomfortable self-scrutiny. But it is precisely through this process of grappling with truth, even when it contradicts our assumptions or forces us to reconsider our perspectives, that we come closer to the essence of wisdom.

In this light, the philosopher's dedication to truth-seeking is not merely an intellectual exercise; it is a deeply ethical commitment, one that reflects the conviction that truth matters—not just for its own sake, but for its capacity to guide us toward a more authentic, coherent, and meaningful understanding of ourselves and the world. Moreover, this belief in the intrinsic value of truth transcends disciplinary boundaries, uniting philosophers across diverse schools of thought and intellectual traditions^{vi}. Regardless of philosophical orientation or specialization, philosophers share a common commitment to upholding the integrity of truth in their pursuit of wisdom. In a sense, we might even say that philosophy remains inspired by the enduring legacy of Socrates, who famously considered it the highest praise to commend his dialogue partners for engaging in discussion solely for the sake of truth.

Truth-Seeking as a Philosophy of Life

However, the pursuit of truth as an intrinsic value, while often heralded as a cornerstone of philosophical inquiry, is far from universally embraced across the spectrum of human behaviors. As some psychological experiments strongly suggest, "people differ in the extent to which they ascribe value to open-minded thinking about evidence, and epistemic rationality".vii Beyond the realm of philosophy, where the quest for truth is elevated more or less consciously as a guiding principle, everyday life

presents a complex interplay of motivations that frequently overshadow this ideal of truth-seeking. For many, the imperatives of preserving social standing, maintaining psychological equilibrium, or securing physical and emotional comfort often outweigh the abstract appeal of truth-seeking. This should come as no surprise. After all, we might say that these competing priorities reflect the variegated and heterogeneous nature of human existence, where practical concerns and immediate gratifications frequently eclipse the long-term, and at times intangible, rewards of truth. As is often the case for many of us, individuals may, consciously or unconsciously, prioritize strategies that safeguard their reputations, reinforce existing beliefs, or conform to societal expectations, even at the expense of confronting inconvenient or uncomfortable realities. Similarly, the desire to garner approval or admiration from peers can lead to selective presentation of facts or even deliberate self-deception, as the drive for social validation takes precedence over objective honesty.

Moreover, cultural, psychological, and situational factors further complicate this dynamic. In certain contexts, truth-seeking may be perceived as a disruptive or even hazardous endeavor, challenging deeply ingrained norms or threatening established power structures. The fear of alienation or reprisal can deter individuals from engaging with or articulating truths that conflict with prevailing narratives. Thus, while the pursuit of truth remains an aspirational ideal, its practical application is often mediated by a host of competing values, making it a selective and, at times, contested endeavor within the broader tapestry of human life. In short, the allure of comfort and the pursuit of social validation often exert a significant influence on individual decision-making, leading many to prioritize these immediate gratifications over the more abstract and demanding quest for truth. The reassurance of familiarity and the instinct to avoid discomfort frequently take precedence over the potential benefits of engaging with the uncertainties and complexities inherent in the pursuit of truth. This tendency becomes particularly evident in the context of philosophical counseling, where practitioners regularly encounter clients whose values and priorities are more closely aligned with the pursuit of comfort than with the pursuit of truth. Such individuals may resist engaging in introspective inquiries that challenge their existing belief systems or disrupt their sense of security. For these clients, truth-seeking may appear not only daunting but also destabilizing, as it often involves

confronting deeply ingrained assumptions, acknowledging personal shortcomings, or re-evaluating long-held convictions. This reluctance towards truth-seeking can be manifested in various ways. For instance, clients may exhibit defensive behaviors, such as rationalizing inconsistencies, dismissing alternative perspectives, or selectively attending to information that reinforces their preconceived notions. Additionally, they may express anxiety or apprehension when faced with questions that compel them to venture beyond the boundaries of their intellectual or emotional comfort zones. These responses highlight the psychological barriers that can impede the pursuit of truth, including the fear of uncertainty, the desire for cognitive closure, and the need for existential security. However, it could be argued that this dynamic presents both a challenge and an opportunity for philosophical counselors. On the one hand, resistance to truth-seeking requires a sensitive and empathetic approach, as overly confrontational methods may exacerbate a client's defensiveness or aversion. On the other hand, the counselor can play a crucial role in gently guiding clients toward a deeper engagement with their values and beliefs, fostering a therapeutic environment where the pursuit of truth is reframed not as a threat but as a pathway to greater authenticity, self-understanding, and personal growth. Nonetheless, navigating these divergent value systems necessitates highly developed communication and interpersonal skills from philosophical counselors, who must strive to create a therapeutic environment that simultaneously respects the autonomy and values of their clients while fostering opportunities for self-reflection and intellectual exploration. This delicate balance requires sensitivity, empathy, and a nuanced understanding of the client's unique psychological and philosophical orientation. Counselors must skillfully mediate between the client's desire for comfort and the broader therapeutic imperative to pursue truth and cultivate selfawareness—a task that demands both patience and finesse.

Unfortunately, even these attributes may not always suffice to overcome the inherent challenges of this dynamic. For instance, when a client holds a strong appreciation for comfort as an intrinsic value, philosophical counseling sessions may eventually reach an impasse: the choice between pursuing the truth and avoiding it to preserve the client's sense of comfort. This dilemma is not merely theoretical but arises frequently in practice. Indeed, I have encountered this predicament on

numerous occasions, and from my discussions with fellow practitioners I understand that they, too, grapple with similar challenges. Such scenarios emphasize a fundamental tension within philosophical counselling as a therapeutic practice: the reconciliation of the counsellor's commitment to truth-seeking with the client's preference for maintaining psychological and emotional equilibrium. In these situations, some counsellors may find themselves tempted to prioritize the client's immediate comfort, either to preserve the therapeutic relationship or to avoid triggering emotional distress. However, this inclination, while understandable, risks undermining the foundational principles of philosophical counselling, which emphasize the pursuit of wisdom, self-examination, and intellectual integrity. By circumventing truth-seeking in favor of maintaining client comfort, counsellors may inadvertently reinforce the very patterns of avoidance and resistance that impede personal growth and selfunderstanding. Moreover, this approach also raises ethical and professional questions about the role of the counsellor in challenging clients to engage with discomfort as a necessary component of transformative inquiry. Avoidance of truth, though initially reassuring, may lead to stagnation, perpetuating shallow engagement with one's values and beliefs. We should always keep in mind that philosophical counselling, at its core, aspires to transcend this very limitation, inviting clients to confront their assumptions, critically evaluate their beliefs, and adapt or change them when necessary. Such transformation naturally leads to changes in their actions and, over time, their character. This occurs because, as Nicholas Rescher beautifully noted, a person's character is deeply shaped by their values: "in the ordinary course of things our standard mode of procedure in depicting someone's character calls in large measure for the description of his values. Value-explanations are naturally akin in their logical structure to character-explanations, precisely because the subscription to certain values is among the most important features definitive of a man's character."viii

Epistemic Foundations: Shaping the Counseling Process

Nonetheless, an alternative approach, though more intricate and less direct, merits consideration. Instead of tactfully circumventing truth for the sake of preserving rapport or alleviating discomfort, practitioners might adopt a strategy aimed at cultivating within their clients a more profound appreciation for epistemic values. These values, encompassing truth, critical thinking, intellectual honesty, and open-mindedness, to name just a few, serve as the bedrock of constructive and meaningful engagement with reality and everyday life. After all, values, broadly speaking, play a fundamental role in shaping a person's behavior and commitments. As Rescher put it, "in the reasoned analysis of the springs of human action, one expects to find an appeal to values primarily in two contexts—in deliberation and decision-making on the one hand, and in the explanation of human behavior on the other."ix Moreover, according to Newman, Bloom and Knobe, recent studies show that "people's values inform their beliefs about phenomena that appear to be decidedly nonnormative in nature."x In other words, values are indeed crucial and inescapable for everyone, regardless of our individual beliefs or preferences. In Zagzebski's words, "if we care about anything, we must care about epistemic goods, and thus there are epistemic demands we cannot escape."xi The reasoning behind this argument is straightforward: if we care about something, we should aim to have true beliefs about it. Therefore, we should cultivate, or at the very least respect, epistemic values, with truth being the most prominent. For example, as Zagzebski illustrates, "If I care about my children's lives and I am minimally rational, I must care about having true beliefs about my children's lives."xii

Therefore, it could be argued that emphasizing values and value-based training in counseling (whether philosophical or otherwise) is neither exotic nor far-fetched. On the contrary, by fostering a culture of epistemic inquiry, practitioners can guide their clients toward recognizing the intrinsic value of truth, not merely as an abstract ideal but as a practical tool for personal and intellectual growth. However, this strategy requires a very nuanced and well-balanced relationship between the practitioner and his or her client. That's because, on one hand, practitioners must respect the emotional and psychological thresholds of their clients, acknowledging that direct confrontation with uncomfortable truths can be counterproductive or even harmful. On the other hand, they bear the responsibility of gradually encouraging a more robust epistemic framework, wherein truth-seeking becomes a shared goal rather than a potential source of conflict or distress.

In adopting this approach, practitioners act as facilitators of epistemic resilience, equipping their clients with the cognitive tools necessary to grapple with complexity and ambiguity. However, as any counselor knows, this process is inherently dialogical, relying on openended questioning, reflective listening, and a collaborative exploration of ideas. Rather than prescribing truths or imposing rigid frameworks, practitioners should encourage clients to engage actively with their own beliefs and assumptions, fostering a sense of agency in the pursuit of knowledge and maybe even emphasizing the moral virtue implied in this process of critically evaluating their own beliefsxiii. This is especially important given that, as Strohminger et al. have observed, some psychological experiments suggest that "value judgments truly play a role in people's reasoning."xiv This indicates that values may be deeply intertwined with our capacity to evaluate situations or real-life scenarios objectively. Rather than being separate from rational analysis, values may actively shape how we process information, prioritize evidence, and draw conclusions. If this is the case, one could argue that attributing intrinsic value to truth and the pursuit of truth is not merely a philosophical stance but a crucial cognitive strategy that enhances decision-making and understanding.

Nonetheless, while this approach may appear compelling in theory, a critical question arises: how can we effectively implement it within the context of our counselling sessions? Well, I guess there are many ways of doing that. For instance, we could take an educational approach, wherein we introduce our clients to the significance of epistemic virtues through curated reading materials, structured exercises, or even guided discussions. These resources can illuminate the practical relevance of truth-seeking, critical thinking, and intellectual honesty in everyday life, thereby grounding abstract concepts in tangible contexts. Another possible approach that we could take would be to create an environment that nurtures intellectual curiosity and open-mindedness. This can be achieved by encouraging our clients to explore a plurality of perspectives, particularly those that challenge their existing assumptions and beliefs. Inviting our clients to critically evaluate their sources of information and prioritize evidence-based, intellectually rigorous materials can foster discernment and can reduce the allure of cognitive bias and confirmationseeking behaviors. If it is constantly practiced, such an engagement can support the development of independent critical faculties, empowering our clients to navigate the complexities of an increasingly polarized informational landscape. Finally, another approach could be that of modeling epistemic virtues within the counsellor-client relationship. In other words, we can serve as exemplars of intellectual humility, courage, and integrity by demonstrating these values in our interactions and, generally, in our counselling relationship. For instance, acknowledging one's own uncertainties or mistakes, engaging in thoughtful dialogue, and resisting the temptation to offer oversimplified solutions all convey a commitment to the principles of truth-seeking. This modeling not only legitimizes the importance of epistemic values but also normalizes the discomfort and effort required to uphold them. In addition, fostering such a collaborative dynamic can deepen clients' engagement with these principles. Rather than positioning ourselves as authoritative sources of knowledge, we might adopt a facilitative role, inviting our clients to cocreate meaning and grapple with ambiguity. This partnership can encourage our clients to take ownership of their intellectual and emotional growth, transforming the counselling process into a shared journey of inquiry and self-discovery.

To sum up, bringing these strategies into our counselling sessions can help foster a stronger appreciation for epistemic values while also giving our clients practical tools to approach the world with greater thoughtfulness and authenticity. By blending education, hands-on exploration, and leading by example, we can bridge the gap between abstract ideas and real-life application, empowering our clients to face life's complexities with more intellectual and emotional strength. That said, these are just a few of the many possible approaches. Ultimately, the specific methods we use matter less than their ability to foster an appreciation for epistemic values and virtues in our clients.

Based on what we have discussed so far, I suppose it might seem quite evident that cultivating epistemic values could offer numerous benefits for our clients, such as enhanced critical thinking skills, heightened self-awareness, and improved communication abilities. But more importantly, this approach aligns seamlessly with the fundamental aim of philosophical counselling that we introduced in the first section: the pursuit of wisdom through systematic inquiry into the truthfulness of beliefs. However, it is important to differentiate this process from a purely

utilitarian evaluation of beliefs based solely on their perceived usefulness. When we evaluate beliefs solely based on how useful they seem, the focus tends to shift toward what feels comfortable or immediately practical. While this approach might offer quick relief or make things easier in the short term, it often misses something essential: the truth. By prioritizing utility over truth, we risk engaging with our beliefs on a shallow level, overlooking the deeper understanding and integrity that come from pursuing what is genuinely true. In the long run, this can undermine the very wisdom and insight we aim to cultivate. In contrast, prioritizing truthfulness involves a deeper commitment to seeking the underlying truth or validity of beliefs, regardless of their immediate utility. This approach requires us to engage in critical inquiry, challenging evidence, exploring assumptions, scrutinizing and alternative perspectives. It entails a willingness to confront discomfort, uncertainty, and even cognitive dissonance in the pursuit of a more accurate understanding of reality. This process usually begins with questioning the beliefs we long held or inherited—challenging assumptions that may feel foundational but might not withstand closer scrutiny. This isn't always pleasant. Sometimes, it feels like pulling at a loose thread in a favorite sweater, knowing the whole thing might unravel. But that willingness to pull the thread—to examine evidence critically, explore alternative perspectives, and confront our own biases—often leads to a richer, more grounded understanding of the world.

Conclusions

To sum it up, I deeply believe that the success of philosophical counselling as a therapeutic practice lies in the thoughtful cultivation of epistemic values within the client-practitioner relationship. At its core, this process is about creating a space where truth-seeking becomes not just an intellectual endeavor but a shared commitment—a journey undertaken together with courage, curiosity, and compassion. When practitioners nurture this commitment, they do more than facilitate dialogue; they guide clients toward a deeper appreciation for the values that underpin genuine understanding. By fostering qualities like intellectual humility, openness to alternative perspectives, and the resilience to confront uncomfortable truths, philosophical counselling becomes a transformative experience. It

empowers clients to navigate life's complexities with greater clarity and self-awareness. To me, this approach is what makes philosophical counselling so unique and profound. It's not about quick fixes or surface-level solutions but about equipping clients with the tools to engage with life's most challenging questions. It's about helping them uncover their own capacity for wisdom—a pursuit that demands patience, honesty, and a willingness to embrace the unknown. This journey isn't always easy, but it is deeply rewarding. There's something profoundly human about seeking truth in partnership with another—about navigating uncertainty and growth together. When practitioners cultivate epistemic values in their clients, they don't just guide them toward answers; they help them build a more authentic and meaningful way of being in the world.

Nonetheless, we should always keep in mind that engaging in the delicate process of exploring a client's personal values is no simple task—it's a journey that requires patience, skill, and an acute sensitivity to the nuances of human experience. Everyone enters the counselling space with a unique combination of beliefs, principles, and priorities, woven together by their upbringing, cultural background, and life experiences. This complexity makes the work challenging, but it's also what makes it profoundly meaningful. To truly help our clients, we must begin by guiding them in reflecting on the origins and significance of their values. This means asking probing, open-ended questions that encourage introspection while actively listening with empathy to uncover the emotions and motivations underlying their beliefs. It's not just about identifying what they value—it's about helping them discern which values genuinely resonate with their authentic selves and which may have been inherited, imposed, or adopted out of societal expectation or familial pressure.

But the journey doesn't end there. Helping clients reassess and critically evaluate their values is even more difficult, especially as we try to encourage them to cultivate a connection to epistemic values like truth-seeking, intellectual humility, and critical inquiry. This process often stirs deep emotional currents, as clients may discover subtle frictions between their core beliefs and their aspirations or even inconsistencies within their value system. These moments can be painful and disorienting, but they are also opportunities for profound growth. As practitioners, our role is to guide them through these complexities with sensitivity and respect. We must honor their cultural and personal contexts while maintaining a space

that encourages self-reflection, critical thinking, and open dialogue. This requires not only technical skill and counselling experience, but also the courage to navigate moments of discomfort or resistance with compassion and steadiness. While this process can be challenging for both client and practitioner, the rewards are extraordinary. By helping our clients to gain clarity about their values and fostering a deeper appreciation for epistemic values, we empower them to live with greater authenticity. They learn to make choices that feel true to who they are, build relationships that are rich and fulfilling, and approach life with a sense of purpose and integrity. In other words, this journey ultimately leads to transformation—not just in how they think but in how they live. And when that happens, we can take comfort in knowing that we, as philosophical counsellors, have fulfilled our role.

Notes

- ¹ See, for instance, Raabe, P. (2001). *Philosophical counseling: Theory and practice* (p. xv). Praeger.
- ii Lahav, R. (2001). Philosophical Counselling as a Quest for Wisdom. *Practical* Philosophy (Vol. 4.1.), 6-18.
- iii There are some very interesting philosophical discussions regarding the consequences of treating truth as an intrinsic value. For example, see *Epistemic* Value, edited by Adrian Haddock, Alan Millar, and Duncan Pritchard (OUP, 2009). While we won't delve into those discussions here, I guess it's worth mentioning them.
- iv Grimm, S. R. (2008). Epistemic goals and epistemic values. *Philosophy and* Phenomenological Research, 77(3), 726.
- V Goldman, A. (1986). Epistemology and cognition (p. 98). Harvard University Press.
- vi Some authors have argued that, regarding the importance placed on epistemic values, the Humanities in general—philosophy included—are on par with, or even surpass, the Sciences. For example, see Peels, R. (2018). Epistemic values in the humanities and in the sciences. History of Humanities, 3(1), 89-111. https://doi.org/10.1086/696304
- vii Ståhl, T., & Turner, J. (2021). Epistemic values and the Big Five: Personality characteristics of those who ascribe personal and moral value to epistemic rationality. PLOS ONE. https://doi.org/10.1371/journal.pone.0258228
- viii Rescher, N. (1967). Values and the explanation of behaviour. The Philosophical Ouarterly, 17(67), 136.
- ix Rescher, N. (1967). Values and the explanation of behaviour. *The Philosophical* Quarterly, 17(67), 130.
- X Newman, G. E., Bloom, P., & Knobe, J. (2014). Value judgments and the true self. Personality and Social Psychology Bulletin, 40(2), 204.
- xi Zagzebski, L. T. (2020). Epistemic values. In Collected papers in epistemology (p. 186). Oxford University Press.
- xii Zagzebski, L. T. (2020). Epistemic values. In Collected papers in epistemology (p. 186). Oxford University Press.
- xiii This is precisely what some authors refer to as "moralized rationality," which involves the inclination to critically evaluate one's own beliefs. For an insightful discussion on this topic, see Ståhl, T., Zaal, M. P., & Skitka, L. J. (2016). Moralized rationality: Relying on logic and evidence in the formation and evaluation of belief can be seen as a moral issue. PLOS ONE, 11(11), e0166332. https://doi.org/10.1371/journal.pone.0166332
- xiv Strohminger, N., Knobe, J., & Newman, G. (2017). The true self: A psychological concept distinct from the self. Perspectives on Psychological Science, 12(4), 556.

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