

A Study on the Application of an Innovative Rhythm-Training Approach in Chinese Primary and Secondary School Percussion Education

Yi Huang*

University of Lisboa, Rua Virgílio Correia, 30 - 2E, 1600-224 Lisboa, Portugal

*Corresponding author: Yi Huang

Copyright: 2025 Author(s). This is an open-access article distributed under the terms of the Creative Commons Attribution License (CC BY-NC 4.0), permitting distribution and reproduction in any medium, provided the original author and source are credited, and explicitly prohibiting its use for commercial purposes.

Abstract: This study examines how innovative percussion-teaching approaches—featuring polyrhythm structures and contemporary percussion practices—can be meaningfully integrated into primary and secondary school music education in China. The aim is to support students in developing musical creativity and expanding the expressive scope of their musical language. Guided by concepts of musical creativity, normative musical development, and participatory music practices, this research critically reviews existing scholarship and proposes a new framework for fostering creativity through percussion learning. By drawing together diverse theoretical perspectives and addressing challenges specific to the Chinese educational context, the study articulates an approach to rhythm instruction that balances technical skill with creative exploration. The framework emphasizes the importance of historical context, systematic rhythm training, and collaborative performance experiences in cultivating students' creative capacities and fluency in musical expression. Ultimately, this study seeks to bridge traditional and innovative pedagogies, offering practical strategies for nurturing a new generation of creative young musicians who can communicate effectively through a rich and expressive musical language, contributing to the ongoing development of music education in China.

Keywords: Rhythm; Percussion Education; Innovative Pedagogy; Chinese Music Education; Participatory Music Practice; Musical Language

Published: Dec 17, 2025

DOI: <https://doi.org/10.62177/jetp.v2i4.926>

1. Introduction

1.1 Research Background and Importance

In recent years, the importance of creativity in music education has been increasingly acknowledged. With ongoing social change and the growing diversity of musical cultures, there is a pressing need to adopt transformative approaches that position creativity as a central dimension of music learning. Creativity is widely regarded as a crucial force that supports students' artistic, cognitive, social, and emotional growth. Incorporating creative approaches into music instruction can spark imagination and innovation, expand students' musical experiences, foster comprehensive musical literacy, and strengthen their fluency in musical language.

However, foundational music education in China has long centered on developing musical literacy and technical skills, with particular emphasis on mastering repertoire. While this model has effectively cultivated discipline and technical proficiency,

it has often left limited space for creative experimentation and personal expression—elements essential for shaping a unique musical identity and for achieving fluency in musical language. In recent years, as music education has expanded significantly in Chinese schools, the need for innovative pedagogies that nurture both performance skills and creativity has become increasingly apparent.

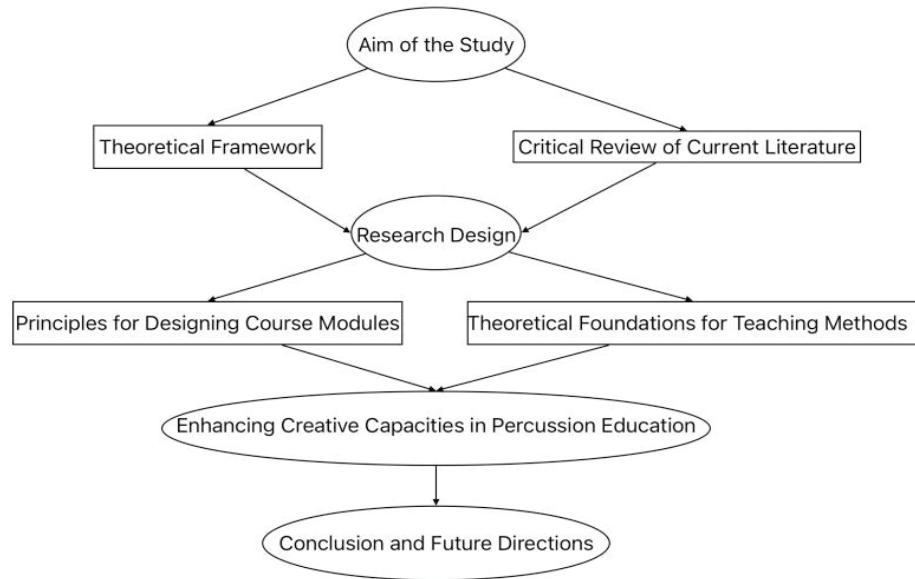
One persistent issue in many Chinese schools is the limited attention given to rhythm education. Despite the centrality of rhythm to musical theory, practice, and musical language, specialized rhythm training is entirely absent in some institutions. Through critical analysis of existing literature, this study addresses this gap by developing a framework that integrates creativity-enhancing, innovative approaches into primary and secondary school percussion curricula. By bringing together contemporary music history, percussion performance techniques, and systematic rhythm training, the study introduces a new pedagogical model aimed at strengthening students' fluency in the rhythmic dimensions of musical language.

The proposed framework seeks to enrich the quality of music education through diversified instructional methods, foster creativity, enhance students' rhythmic awareness, and support their broader musical growth and expressive capabilities. Drawing on established theories and practices while responding to the unique challenges and opportunities of the Chinese educational context, the study synthesizes insights from multiple perspectives and provides practical strategies for implementation. Through these efforts, it aims to offer viable approaches for advancing the development of music education in China.

1.2 Research Objectives

Building on the gaps identified in current practice and the pressing need for innovative approaches in Chinese primary and secondary school percussion education, this study sets out the following objectives. The aim of this research is to develop a theoretically grounded framework that integrates innovative pedagogical strategies to cultivate both creative expression and fluency in musical language within the context of Chinese primary and secondary school percussion education. Specific objectives include:

Figure 1: Research Framework



1. To critically examine theories of musical creativity, normative musical development, and participatory music practices, synthesizing key insights to establish a robust foundation for the proposed framework.
2. To design a suite of teaching strategies grounded in polyrhythm, body percussion, and collaborative learning, aimed at enhancing students' musical expressiveness, teamwork skills, and command of musical language, while addressing specific contextual challenges within the Chinese educational system.
3. To introduce adaptable, interactive, and participatory curricular content that opens new possibilities for music education, balancing technical proficiency with creative exploration and respecting established Chinese educational traditions.

4. To propose a comprehensive curriculum design that weaves together historical context, systematic rhythm training, and innovative performance experiences, offering an integrated method for fostering students' musical creativity and linguistic fluency.

5. To provide practical strategies for implementing the proposed framework, including iterative refinement through pilot studies and broader scaling, ensuring adaptability and effectiveness across diverse, real-world teaching environments.

The research structure, illustrated in the accompanying mind map (Figure 1), highlights the key components and their logical progression. By systematically addressing these objectives, this study aims to contribute to the advancement of music education in China, providing a clear roadmap for developing creativity and proficiency in musical language through percussion pedagogy.

2. Theoretical Foundation and Literature Review

This study is grounded in three interrelated theoretical perspectives: theories of musical creativity, normative musical development, and participatory music practices. Together, these perspectives provide a robust, multidimensional framework for exploring the potential of polyrhythm learning and percussion education to cultivate students' creativity.

2.1 Theories of Musical Creativity in Music Education

Theories of musical creativity highlight the central importance of fostering creativity within music education. Creativity is increasingly recognized not as an ancillary goal, but as a core pillar of pedagogy. This perspective is particularly relevant to polyrhythm learning, as mastering complex rhythmic structures demands high levels of creative engagement and problem-solving from students. Webster notes that music education is entering a new era in which creativity is positioned as a central dimension^[1]. Humphreys emphasizes that creativity in music education should extend beyond professional composition, formal curricula, or traditional art music, encompassing broader forms of musical practice^[2]. These insights collectively underscore the pervasive and multifaceted role of creativity in music education.

2.2 Normative Musical Development Theory

Normative musical development theory offers a structured, stepwise approach to music education, emphasizing progression from foundational skills to advanced creative expression. Jaques-Dalcroze highlights rhythm training as fundamental to musical development, advocating the use of bodily movement to internalize complex rhythmic structures^[3]. This embodied approach systematically builds students' musical understanding. Further studies by Juntunen and Hyvönen illustrate the application of Dalcroze Eurhythmics, showing that it not only improves rhythmic accuracy but also fosters coordination, creativity, and emotional engagement in music^[4]. Rohrmeier introduces a contemporary perspective by modeling the abstract syntax of musical rhythm, demonstrating the significance of temporal structure in music understanding and providing a scientific framework for rhythm interpretation and reasoning^[5]. These approaches support progressive teaching, enabling students to transition from simple rhythms to the mastery of complex polyrhythms. This perspective aligns with Honing's findings. He further highlighted the interplay between innate rhythmic abilities and learned skills, suggesting that progressive training can enhance both natural aptitude and technical proficiency^[6].

2.3 Participatory Music Practices

Participatory music practice theory emphasizes the social and collaborative dimensions of music education, aligning closely with the collective nature of polyrhythm performance. Small frames music education as a social activity, highlighting that teaching should foster interaction and cooperation among learners, not only individual technical development^[7]. Qiu and Hirunrux examine body percussion education in Guangzhou, demonstrating its benefits for enhancing student collaboration, coordination, and group cohesion^[8]. Interdisciplinary approaches further exemplify participatory practice. Hughes describes a collaborative project at the Edinburgh International Science Festival that combined new music percussion with scientific exploration to create an immersive, multisensory experience^[9]. This project bridged tradition and innovation, showing how interdisciplinary education can engage diverse audiences while nurturing creativity.

2.4 Integrating the Three Perspectives

The relationships among normative musical development theory, musical creativity theories, and participatory music practices can be understood as mutually supportive and complementary, forming a unified theoretical framework for music education

(Figure 2). This integrated framework aims to cultivate both students' musical creativity and their holistic development.

Based on this framework, the following hypotheses illustrate the interplay among the perspectives:

H1: Normative musical development as a foundation for musical creativity

Normative musical development provides the necessary skills and knowledge for creative musical practice. Polyrhythm learning and interdisciplinary collaboration further reinforce musical creativity.

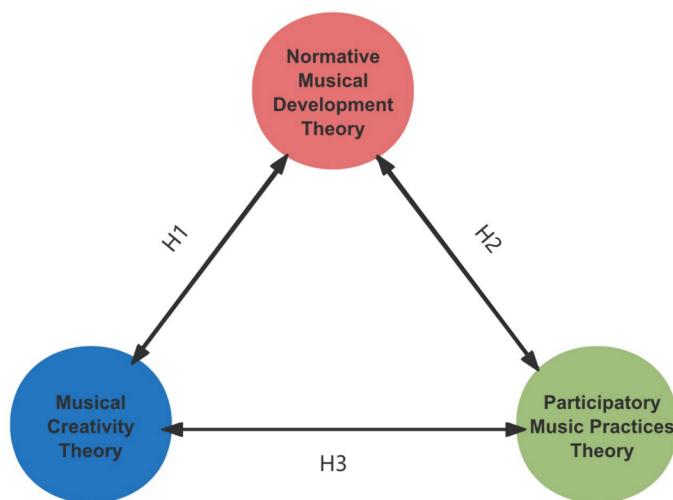
H2: Reciprocal influence between musical development and participatory practice

Music development and participatory practice influence each other bidirectionally. Improvements in educational policies and strategies enhance participatory practices, which in turn inform and refine music development.

H3: Participatory music practices as a bridging mechanism

Participatory practices bridge musical creativity and normative musical development, emphasizing experiential learning and collaboration. Activities such as improvisation and ensemble performance cultivate creativity, refine students' ideas, and enhance interpersonal skills.

Figure 2: Theoretical Framework Flowchart



3. Critical Review of Rhythm Education Research and Challenges

3.1 Challenges and Insights in Fostering Creativity in Music Education

Csikszentmihalyi argue that effective music educators should simultaneously cultivate two forms of creative musical expression: reproducing existing music and engaging in improvisation^[10]. Both activities mutually reinforce one another and are essential for comprehensive musical development. However, educators often struggle to integrate creativity into their teaching. Dogani notes that teachers frequently focus on a single dimension of music education, overlooking multidimensional development^[11]. Economidou Stavrou emphasized that inadequate teacher training in creative processes is a significant barrier, and further highlighted the potential for creative music projects to influence teacher beliefs, suggesting that these insights should be incorporated into teacher training^[12]. Henry identifies limited instructional time as another constraint, with educators often prioritizing skill acquisition over creative activities^[13]. These challenges highlight the need for innovative approaches, such as polyrhythm learning, to balance technical skill development with creativity cultivation.

In the context of Chinese education, rhythm instruction is shaped by a range of structural and pedagogical dynamics. Yu and Leung examined the implementation of the new Music Curriculum Standards in China, noting that while these standards emphasize creativity and student-centered learning, many teachers struggle to translate these principles into practice due to a lack of training and resources^[14]. Zhou further investigated the impact of teaching methods on creativity, surveying 224 students across four music secondary schools in Tianjin^[15]. Her findings indicate that instructional strategies significantly influence students' creative output, particularly in composing original melodies integrating diverse rhythms, harmonies, and tonalities, though she acknowledges the difficulty of defining and systematically assessing creativity in this educational context. These insights underscore the complexity of rhythm education in China and the importance of context-sensitive curricula and pedagogical strategies. They also highlight the need for scalable, reliable tools to evaluate creativity in music

education, laying the groundwork for future improvements in teaching practice.

3.2 The Role of Social Interaction and Creative Music Curricula

Jaques-Dalcroze advocated for creative, active learning strategies in music education to encourage deeper engagement. Techniques such as polyrhythm training, body percussion, and improvisation allow students to experiment with novel rhythmic combinations, develop problem-solving skills, and foster active participation. Music education should extend beyond technical skill acquisition, emphasizing creativity and personal expression. Research by Hargreaves et al. highlights the importance of social interaction and collaboration in music education^[16]. Small introduced the concept of musicking, framing music as a dynamic social activity in which all participants—performers, listeners, and composers—play a vital role. This collaborative process fosters a sense of shared belonging and encourages creative expression.

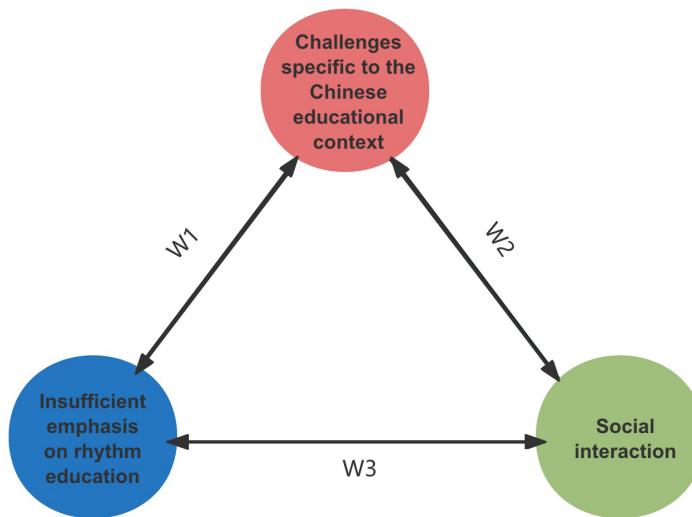
3.3 Insufficient Emphasis on Rhythm Education

Rhythm is foundational to musical experience across all cultures, yet it remains underexplored in many educational systems. In Chinese primary and secondary school rhythm education plays a key role in developing musical literacy but is not always sufficiently emphasized. Some studies report that music lessons resemble other cultural subjects, focusing on theoretical knowledge and rote memorization. Such traditional methods may limit student engagement and fail to address the practical and enjoyable aspects of music education. In some schools, music instruction focuses primarily on singing, with less attention to rhythm and other musical skills. Teachers may not fully recognize the importance of rhythm training, and pedagogical approaches may not align with contemporary educational needs. Given that rhythm forms the basis of music, it is closely linked to students' musical perception, creativity, and aesthetic appreciation. Integrating techniques such as body movement and instrumental practice can enhance rhythmic sense and improve overall quality of music education. Rhythm is not only essential for performance but also for developing musical imagination and expressive abilities.

3.4 Multidimensional Framework and Interrelated Challenges

Figure 3 presents the three key challenges affecting the development and implementation of rhythm education in the Chinese context, along with their interrelationships:

Figure 3: Multidimensional Methodological Framework Flowchart



W1: Impact of Contextual Challenges on Rhythm Education

Specific challenges in the Chinese education system—such as disparities in resource availability, exam-oriented priorities, and differences in teacher training—directly influence the emphasis placed on rhythm instruction. The arrow labeled “W1” indicates that systemic issues may inadvertently deprioritize rhythm education. In environments dominated by limited resources and adherence to established norms, introducing rhythm-centered approaches may face significant practical constraints.

W2: Reciprocal Influence Between Contextual Challenges and Social Interaction

The bidirectional arrow “W2” represents the interaction between systemic challenges and opportunities for social interaction

in music education. Constraints such as exam-focused goals and limited resources may restrict the feasibility of implementing interactive, student-centered learning. Conversely, a lack of social interaction may reinforce the individualistic, test-driven nature of the educational environment, perpetuating these challenges and making it more difficult to prioritize collaborative learning experiences.

W3: Effect of Insufficient Rhythm Education on Social Interaction

The arrow labeled "W3" emphasizes that insufficient attention to rhythm education can reduce opportunities for social interaction in music learning. Rhythm is fundamental for group cohesion and collective musical creation. When rhythm instruction is underrepresented, students may lack opportunities to participate in collaborative musical experiences that foster social connections, teamwork, and interpersonal skills. Greater emphasis on rhythm education can strengthen these social dynamics, allowing students to engage more fully in shared musical activities while simultaneously developing essential social competencies.

4. Pedagogical Framework and Course Design

This curriculum is designed following a comprehensive and systematic approach, organized into three core modules:

4.1 Historical Context: Development of Contemporary Music

This foundational module provides students with a broad overview of contemporary music from the 1920s to the present, covering both Western and Chinese developments.

Western Contemporary Music: Students explore pioneering works by composers such as Arnold Schoenberg, Olivier Messiaen, and Alban Berg. Detailed study includes Schoenberg's twelve-tone system, Messiaen's distinctive harmonic language and rhythmic complexity, and Berg's expressive atonal works. Engaging video demonstrations, carefully selected musical examples, and interactive classroom discussions help students understand how these composers challenged traditional conventions and paved the way for new forms of musical expression.

Chinese Contemporary Music: Focus shifts to notable Chinese composers, including Tan Dun, Chen Qigang, and Guo Wenjing. Students examine how these composers successfully blend Western compositional techniques with traditional Chinese musical elements, creating distinctive and internationally recognized Chinese contemporary music. Innovations such as Tan Dun's use of unconventional instruments and multimedia, Chen Qigang's integration of folk melodies with Western orchestration, and Guo Wenjing's powerful, emotionally charged works serve as exemplars of cultural synthesis.

Throughout the module, the central role of rhythm in contemporary music is emphasized. Students observe how composers experiment with complex rhythmic structures, polyrhythms, and irregular meters to create novel and engaging musical textures. This historical foundation prepares students for practical applications, allowing them to explore creative possibilities of rhythm in their own musical attempts.

4.2 Rhythm Training: Polyrhythms and Body Percussion Techniques

This module focuses on mastering complex polyrhythms (e.g., 3:4, 3:5) and body percussion exercises. Carefully designed activities guide students from fundamental patterns to more advanced forms. Under guided instruction, students use body percussion and ensemble exercises to deconstruct and internalize complex rhythms. For example, students practice creating layered rhythmic textures in groups, fostering individual precision and ensemble cohesion. The Takadimi system and some polyrhythmic training exercises are incorporated to enhance personal skill development and group collaboration^[17]. Digital tools, such as Composite Tool, are used to visualize and analyze complex rhythms, bridging theoretical concepts and practical application^[18]. This approach facilitates deeper understanding and mastery of intricate rhythmic structures. Consistent with Jaques-Dalcroze, active, creative learning through body percussion and improvisation enhances problem-solving skills, engagement, and participatory learning, encouraging students to develop both musical skills and creative thinking.

4.3 Percussion Performance: Innovation and Collaborative Application

This module provides students with opportunities to apply their skills in rehearsal and performance of two to three contemporary percussion ensemble pieces. Selected repertoire balances technical challenge with musical expressivity, ensuring all students can contribute meaningfully regardless of skill level. Students are encouraged to select or compose their own works, promoting creativity, autonomy, and ownership of learning. Brainstorming sessions allow experimentation

with sound and collaborative creation of original compositions. Teamwork and achieving musical balance are emphasized, incorporating unconventional instruments such as everyday objects or body percussion. These innovative methods encourage students to explore the full potential of sound in creative music-making. Through music, adolescents can develop self-identity while enhancing social skills through interaction and comparison with peers.

5. Application of Polyrhythm Theory and Innovative Pedagogical Approaches

This section details the practical implementation of polyrhythm theory in the curriculum, highlighting the integration of innovative teaching methods, technological tools, and iterative course refinement.

5.1 Application of Polyrhythm Theory

The curriculum effectively utilizes the Takadimi system (Figure 6) and polyrhythm exercises (Figure 4 and Figure 5) to guide students from deconstructing complex rhythms to understanding their integrated structures.

Figure 4: Højsgaard, Erik. 2016. *Rhythm: Advanced Studies*, p.52.



Figure 5: Cangelosi, Casey. 2017. *Shape Class*, p.136.

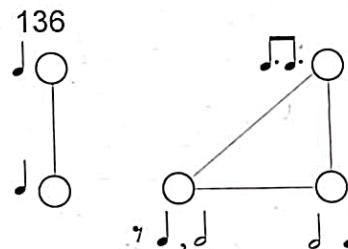


Figure 6: Hoffman, Richard. 2009. *Learning Rhythm with the Takadimi Sight-Singing System*.



Irregular divisions — To perform irregular divisions of the beat, add a syllable to a common pattern.



Asymmetric meters — Asymmetric meters combine simple and compound divisions. Keeping the divisions equal will produce beats of varied lengths.



By breaking down complex polyrhythms into simpler components, students gain a deeper understanding of intrinsic rhythmic relationships. The Takadimi system employs intuitive syllabic representations of rhythm, enabling students to internalize and verbalize intricate rhythmic patterns. This approach not only enhances their ability to perform polyrhythms accurately but

also fosters a more comprehensive grasp of rhythm as a conceptual and practical element of music.

Additionally, the integration of body percussion and layered rhythmic techniques has proven critical in developing students' understanding of rhythmic dynamics. Experiencing different rhythmic layers physically allows students to perceive interactions among rhythmic elements. Kinesthetic engagement helps students feel the pulse, subdivisions, and syncopations inherent in polyrhythmic structures. Moreover, collaborative exercises further teach students to align their rhythms with those of their peers, enhancing ensemble awareness and precision.

5.2 Integration of Innovative Teaching Methods

The curriculum successfully incorporates learner-centered approaches, prioritizing active participation and collaborative music-making. Moving beyond traditional teacher-centered instruction, students are empowered to take ownership of their learning. Techniques such as role rotation and group collaboration cultivate leadership skills, effective communication, and a strong sense of shared responsibility for musical outcomes. Democratizing classroom dynamics creates a safe and inclusive space, encouraging students to experiment, take risks, and contribute unique perspectives. This supportive environment is essential for fostering creativity and self-expression. Through open-ended discussions, brainstorming sessions, and improvisation exercises, students develop critical thinking, inquiry skills, and the ability to explore unconventional ideas. These experiences deepen their understanding of rhythmic concepts while nurturing a lifelong engagement with music and learning.

Moreover, the integration of digital tools, such as the Composite Tool, further enhances the learning experience by providing visual representations of complex rhythmic structures. Interactive resources allow students to manipulate and analyze rhythms in real-time, promoting intuitive understanding of polyrhythmic relationships. By leveraging technology, the curriculum bridges the gap between theoretical concepts and practical application, equipping students with skills necessary to navigate an increasingly digital musical environment.

5.3 Cultivating Creative Thinking and Growth Mindset

The curriculum emphasizes strategies that encourage a growth mindset in approaching rhythm education. Students learn to view challenges as opportunities for learning and development, building resilience and perseverance when tackling complex rhythmic tasks. Mistakes are framed as valuable feedback, and iterative trial-and-error processes support refinement of ideas. This mindset fosters a culture of continuous improvement and self-reflection, qualities essential for long-term success in music and other disciplines.

5.4 Iterative Refinement Through Practice and Feedback

The curriculum employs an iterative design approach, ensuring responsiveness to the evolving needs of students and educators. Pilot studies and stakeholder feedback guide ongoing refinement, allowing adjustments that enhance effectiveness and adaptability across diverse learning environments. Active participation of teachers and coordinators in these trials is crucial for identifying strengths and areas for improvement. Documenting their experiences, challenges, and successes contributes to a rich feedback loop, informing future iterations of the curriculum and ensuring alignment with classroom realities. Student feedback is equally vital. By actively soliciting and incorporating student perspectives, the curriculum better addresses their interests, learning styles, and aspirations. Regular assessment of learning outcomes provides tangible evidence of the curriculum's impact, supporting data-driven decisions in its ongoing development. This evidence-based approach ensures the curriculum remains effective in achieving its intended objectives and fostering student creativity.

6. Conclusion

This study aims to provide a practical framework for integrating innovative percussion pedagogy into primary and secondary music education in China, with a focus on fostering creativity and developing rhythmic skills. By drawing on multiple theoretical perspectives, the framework seeks to offer a structured yet flexible approach that combines historical context, systematic rhythm training, and collaborative performance experiences. The curriculum design emphasizes learner-centered and participatory approaches, encouraging students to actively engage in music-making, experiment with rhythms, and develop their own expressive voices. While the framework is still exploratory, its iterative nature allows for ongoing adaptation based on student and educator feedback, helping to identify practical strategies that may support creativity and

musical development in diverse classroom contexts. Rather than presenting a definitive solution, the framework offers a starting point for educators and researchers to explore, refine, and expand methods that balance technical skill development with creative exploration. Ultimately, this study hopes to contribute to ongoing conversations about music education in China, providing insights and strategies that may inform future practice, curriculum design, and research, while acknowledging that much work remains to be done to fully realize the potential of innovative, creativity-oriented percussion education.

Funding

No

Conflict of Interests

The authors declare that there is no conflict of interest regarding the publication of this paper.

Reference

- [1] Webster, P. R. (1998). The new music educator. *Arts Education Policy Review*, 100(2), 2–6.
- [2] Humphreys, J. T. (2006). Toward a reconstruction of “creativity” in music education. *British Journal of Music Education*, 23(3), 351–361. <https://doi.org/10.1017/S0265051706006884>
- [3] Jaques-Dalcroze, E. (1921). *Rhythm, music and education*. London.
- [4] Juntunen, M.-L., & Hyvönen, L. (2004). Embodiment in musical knowing: How body movement facilitates learning within Dalcroze Eurhythmics. *British Journal of Music Education*, 21(2), 199–214. <https://doi.org/10.1017/S0265051704005686>
- [5] Rohrmeier, M. (2020). Towards a formalization of musical rhythm. In *Proceedings of the International Society for Music Information Retrieval Conference (ISMIR)* (pp. 621–629).
- [6] Honing, H. (2013). Structure and interpretation of rhythm in music. In D. Deutsch (Ed.), *The psychology of music* (3rd ed., pp. 369–404).
- [7] Small, C. (1998). *Musicking: The meanings of performing and listening*. Wesleyan University Press.
- [8] Qiu, Z. L., & Hirunrux, S. (2022). The development and application of body percussion in music education, Guangzhou, China. *Asia Pacific Journal of Religions and Cultures*, 6(1), 94–111.
- [9] Hughes, G. (2020). Music, science and expert listening: Interdisciplinarity and solo percussion performance. *Steam*, 4(2), 1–9.
- [10] Csikszentmihalyi, M. (2002). *Creativity and music education* (Vol. 1). Canadian Music Educators' Association.
- [11] Dogani, K. (2004). Teachers' understanding of composing in the primary classroom. *Music Education Research*, 6(3), 263–279.
- [12] Economidou Stavrou, N. (2013). Fostering musical creativity in pre-service teacher education: Challenges and possibilities. *International Journal of Music Education*, 31(1), 35–52.
- [13] Henry, W. (1996). Creative processes in children's musical compositions: A review of the literature. *Update: Applications of Research in Music Education*, 15(1), 10–15.
- [14] Yu, Z., & Leung, B. W. (2019). Music teachers and their implementation of the new music education curriculum standards in China. *International Journal of Music Education*, 37.
- [15] Zhou, Q. (2021). Retracted: Development of creative thinking skills through aesthetic creativity in middle school educational music course (p. 263).
- [16] Hargreaves, D. J., Miell, D., & MacDonald, R. (2002). *Musical identities*. Oxford University Press.
- [17] Hoffman, D. M. (1996). The Takadimi system: A rhythmic solfège method. *Music Educators Journal*, 82(7), 22–26.
- [18] Poudrier, È., & Sapp, C. (2022). Composite tool: A computational system for the visualization and analysis of polyrhythms. *Music Theory Online*, 28(1).