

Models of Polish Legal Education during Second World War: the Swiss Example

Abstract

The history of the teaching of Polish law during the Second World War is a multifaceted and complex phenomenon. On the map of “wartime” universities, the camps for interned soldiers of the 2nd Infantry Rifle Division became important centres. Between 1940 and 1945, in agreement with the University of Freiburg and the University of Zurich, it was there that Poles were given the opportunity to study law. The aim of this text is to analyse the surviving curricula of the two centres and to point out the differences that existed between them. This information is analysed in the context of the objectives that guided the organisers of the legal studies for Polish soldiers, in order to show the realisation of the project as well as the evolution of the original intentions.

KEYWORDS: legal education, Second World War, 2nd Infantry Rifle Division, university camps

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1 | Introduction

The topic of legal education organised by Poles during World War II is an issue that has been of interest to historians and legal historians for years. On the basis of archives, documents and the memoirs of both scholars and students, the reality of secret teaching in Poland is reconstructed,^[1]

¹ Stanisław Gawęda, *UJ w czasie okupacji hitlerowskiej* (Kraków: Państwowe Wydawnictwo Naukowe, 1979); Bronisław Gralak, *Szkolnictwo wyższe i nauka polska*

together with the organisation of colleges in the countries that received Polish refugees and the teaching of law in camps, for both the interned soldiers^[2] and those staying in oflags.^[3] The organisation of learning in each of these places posed a different type of challenge. Indeed, it is a separate issue to teach students in a situation where life or liberty is threatened, while it was different in the territory of sovereign states not plagued by direct military action.

The curriculum of a law degree programme is closely linked to the current legal order of a given country. It is not surprising, therefore, that efforts to facilitate the study of law were focused on the regulations that were in force in the Republic of Poland before the outbreak of the Second World War. This can be seen, for example, in the activities of the initiators of the Polish Faculty of Law at Oxford University, which in April 1944 inaugurated its activities.^[4] Students there were educated according to the syllabus

pod okupacją niemiecką i radziecką (Zgierz: [Bronisław Gralak], 2010); Piotr Kałwa, "Sprawozdanie z tajnego nauczania w Kielcach", [in:] *Skład osobowy. Spis wykładów i instytucji Katolickiego Uniwersytetu Lubelskiego w roku akademickim 1946/47 oraz sprawozdanie za lata poprzednie* (Lublin, 1947), 17-18; Władysław Kowalenko *Tajny Uniwersytet Ziemi Zachodnich – Uniwersytet Poznański 1940–1945* (Poznań, Instytut Zachodni, 1961); Adam Redzik, *Wydział Prawa Uniwersytetu Lwowskiego w latach 1939–1946* (Lublin: Towarzystwo Naukowe KUL, 2006).

² A final summary and evaluation of the research to date was provided by Władysław Drobny, *Walka bez oręża. Polskie obozy uniwersyteckie dla internowanych w Szwajcarii w latach 1940–1946* (Warszawa-Poznań: Państwowe Wydawnictwo Naukowe, 1985), 6-12. Since then, there have been several works clarifying particular issues, listed by Piotr Bilinski, *Adam Vetulani (1900 – 1976). Historyk prawa polskiego i kanonicznego* (Kraków: Wydawnictwo Uniwersytetu Jagiellońskiego, 2023), 122-123 (n. 68).

³ Jerzy Gawenda, "Nauki prawne na obczyźnie", [in:] *Nauka polska na obczyźnie. Stan i perspektywy badawcze: konferencja naukowa 11-12 września 1998 r. w Zielonej Górze*, ed. Wiesław Hładkiewicz, Marek Szczerbiński, (Gorzów Wielkopolski, 2000), 71 wrote that law was taught in Oflag 17 A in Edelnbachau, where the head of the school was Jerzy Longrod, a professor of law and public administration at the Jagiellonian University, and later Michał Szczaniecki, later a professor at the Adam Mickiewicz University and the University of Warsaw. Gawenda indicated Oflag II C, located in Woldenberg (now Dobiegniew), as the second camp in which the legal school was organised. Certificates and diplomas issued in Oflag were honoured in post-war Poland. Wacław Kotański, *Uniwersytet za drutami Cz.2* (Warszawa: Krajowa Komisja Woldenberczyków w Dobiegniewie, 1994/95). See also: Tomiczek Henryk, Miron S. Zarudzki. *Jeniecka konspiracja wojskowa w oflagu II C Woldenberg* (Poznań: Wydawnictwo Poznańskie, 1989).

⁴ On the origins of the Polish Faculty of Law and previous activities for the Polish legal community in the UK, see Janusz Mierzwa, "Działalność Polskiego

of legal studies as it existed in pre-war Poland, with a slight addition of subjects taught at law schools in England.^[5] The unit's predecessor in the British Isles may be considered to be the Faculty of Law and Economics of the then emerging Polish University Abroad, based in Paris, which operated between December 1939 and May 1940. However, the university's activities came to an end during the two trimesters that took place before the German army entered the French capital.^[6] The aim of both centres was focused on legal education, which was to shape the future administrative and legal workforce needed in liberated Poland.^[7] The opening of the faculty was intended to enable those whose education had been interrupted by the war

Wydziału Prawa w Oksfordzie oraz organizacji zrzeszających polskich prawników na terenie Zjednoczonego Królestwa w latach 1940–1947” *Niepodległość i Pamięć*, 3 (2018), 80–83.

⁵ The Polish Faculty of Law at the University of Oxford offered its students lectures by Polish professors on economics, statistics, civil law, criminal law, treasury and budgetary law, commercial and bills of exchange law, administrative and state law, legal theory, and philosophy, history of Western European law and international law. Mierzwa, “Działalność Polskiego Wydziału Prawa”, 87–88. Oxford professors taught Roman law, constitutional law, and an introduction to English law to the Poles. Tadeusz Brzeski, “Polski Wydział Prawa przy Uniwersytecie w Oksfordzie”, [in:] *Monografia polskiego Wydziału Prawa 1944–1947 Uniwersytetu w Oksfordzie*, ed. Janusz W. Cywiński, Tadeusz S. Rojewski, Wiesław Toporowski (Londyn: Polska Fundacja Kulturalna: Caldrea House, 1997).

⁶ Although a statute for the University was drafted, it lacked final approval from the government and the President. Jan Draus, Ryszard Terlecki, *Polskie szkoły wyższe i instytucje naukowe na emigracji 1939–1945* (Kraków: Ossolineum, 1984), 8–10. The Dean of the Faculty of Law and Economics was S. Glaser, later Dean of the Polish Faculty of Law at Oxford University. We should also not forget the School of Administration and Law, active between 1942 and 1944, which trained lawyers by correspondence and published scripts.

⁷ Among the lectures prepared for the law students of the Polish University Abroad are criminal law and criminal procedure, an outline of commercial and bills of exchange law, international law, issues of administrative law, the Polish code of obligations, constitutional law, an outline of general treasury, issues in legal theory, economic issues of contemporary Poland, general principles of private inter-district and international law and the system of ancient and contemporary Germany. Tadeusz Sulimirski, “Uniwersytet Polski za Granicą w Paryżu”, [in:] *Nauka Polska na Obczyźnie*, vol. I, ed. Tadeusz Sulimirski, (Londyn: Polskie Towarzystwo Naukowe na Obczyźnie 1955), 14–18 Tadeusz; Wyrwa, “Założenie Uniwersytetu Polskiego za Granicą w Paryżu w 1939 r.”, [in:] *Pokoleniowe rozstaje dróg*, Tadeusz Wyrwa (Lublin: Norbertinum, 2007), 153.

to resume their studies at university level.^[8] Both initiatives are mainly based on a Polish foundation: the academic staff.

The issue was somewhat different in Switzerland, where, following the internment of the 2nd Infantry Rifle Division in June 1940, more than 13,000 Polish soldiers landed on the territory of a neutral country. As W. Drobny pointed out, already in the first days after the internment there appeared – from various sides – ideas for the organisation of teaching, also at university level. The first actions taken by the command of the 2nd Infantry Rifle Division were the issuing of orders concerning the preparation of lists of soldiers willing to continue their studies in order to apply to the Swiss authorities to allow the internees to study.^[9] These activities were actively supported by Aleksander Ładoś, as Minister Plenipotentiary of the Polish Embassy in Bern.^[10] The role of the soldiers themselves cannot be overstated either; many of them had been linked to Polish universities before the war, including Adam Vetulani, who lobbied actively for the organisation of science and cultural life for the internees.^[11]

It was not only the Polish side that was interested in the academic initiative. Parallel to the activities of the Polish command, the secretary general of the Fund for the Assistance of Students (FESE), Andre de Blonay, sought to allow the three hundred internees to study at Swiss universities.^[12]

⁸ An important aspect of organising academic courses in exile was the need to manage a significant proportion of refugee intelligentsia, whose career paths and education were based on legal studies.

⁹ Drobny, “Walka bez oręża,” 15-17.

¹⁰ Barbara Świtalska-Starzeńska, “Poselstwo RP w Bernie i jego wpływ na szkolnictwo polskie typu wyższego na terenie Szwajcarii w latach 1940-1942” *Rozprawy z Dziejów Oświaty*, 58 (2021): 159-171.

¹¹ The degree of personal involvement in the organisation of studies in Switzerland is evidenced by A. Vetulani’s book of memoirs, *Poza płomieniami wojny. Internowani w Szwajcarii 1940-1945* (Warszawa: Wydawnictwo Ministerstwa Obrony Narodowej, 1976), where the author describes the background to the establishment of the entire higher education system in the camps, as well as discusses in detail the activities of the Grangeneuve/Freiburg camp. The most recent findings on Adam Vetulani’s activities in Switzerland were made by Bilinski, “Adam Vetulani,” 109-160.

¹² In September 1940, General Prugar Ketling informed Alexander Ładoś that Andre de Blonay had informed the command of the Swiss authorities’ objections to the proposed number of students. The general therefore asked the minister to be willing to use his influence and push through the number of two hundred students. Central Military Archives in Warsaw (further: CAW in Warszawie), ref. II.50, 2 DSP, vol. 503, card no. 3, *list generała Bronisława Prugar Ketlinga do ministra pełnomocnego RP w Bernie, Aleksandra Ładosia* (letter from General Bronisław Prugar

He even obtained the approval of the Swiss military authorities, which, however, was not agreed to by the Political Department. Hence, in September 1940, he applied to the Internment Committee for the possibility of setting up camps located near scientific centres that would function as university camps. This project was given the green light, and the camps were to begin operation no later than 1 November 1940.^[13] The authorities of the patron universities appointed their representatives to act as both “camp rectors” and faculty supervisors – “deans.” In consultation with the Polish assistants,^[14] it was their task to decide on the curriculum and teaching timetable.^[15]

Legal studies were launched within the framework of two camps for interned soldiers – in Freiburg and Winterthur. The programme was continuously taught throughout the existence of the internment camps. This paper aims to analyse the models of legal studies that were shaped during the existence of the camps, as well as to indicate the differences between the camps themselves and other centres, teaching law to Poles in exile. In addition, the text analyses the source material in the context of the aims of the creators of the camp universities and how their realisation came into being.

2 | Source material

The primary research material for this paper consists of archival sources. The first set comprises the documents of the 2nd Infantry Rifle Division, which are deposited in the Central Military Archives (CAW).^[16] With regard to the university camps themselves, the CAW collection contains reports on the activities of the camps, correspondence, both with the staff of the commander, General Bronisław Prugar-Ketling, and with other entities.

Ketling to the Polish Minister Plenipotentiary in Bern, Aleksander Ładoś), dated 17 September 1940., 1.

¹³ Drobny, “Walka bez oręża,” 18-20.

¹⁴ On the role of Polish research assistants, see Izabela Leraczyk, “Polish Auxiliary Forces and their Law Academic Scripts at the University Camp in Grange-neuve/Fribourg” *Acta Universitatis Lodziensis. Folia Iuridica*, 99 (2022): 137-151.

¹⁵ Vetulani, “Poza płomieniami,” 68.

¹⁶ Central Military Archives in Warsaw (further: CAW in Warsaw), ref. II.50, 2 DSP.

It is not a complete collection, although it has been thematically arranged through the efforts of the Archives. The second, no less important collection is the documents in Adam Vetulani's legacy deposited in the archives of the Polish Academy of Sciences and the Polish Academy of Arts and Sciences in Cracow.^[17] The documents are mainly of a private nature and include many letters, draft reports, notes and observations and copies and translations of camp documents. In addition to academic studies, the literature on the subject includes published memoirs of witnesses to the events of the time.^[18]

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¹⁷ Archives of Science of the Polish Academy of Sciences and the Polish Academy of Arts and Sciences in Cracow (further: AN PAN and PAU in Cracow) ref. K-58, The legacy of Adam Vetulani.

¹⁸ Aleksander Blum, *O broń i orły narodowe... Z Wilna przez Francję i Szwajcarię do Włoch* (Pruszków: Oficyna Wydawnicza „Ajaks”, 1997); Jerzy Rucki, *Na ziemi Wilhelma Tella* (Warszawa: Bellona, 1993); Edmund Thielmann *Żołnierska odyseja* (Pruszków: Ulmak, 1998); Vetulani, “Poza płomieniami”.

¹⁹ Central Military Archives in Warsaw (further: CAW in Warsaw), ref. II.50, 2 DSP.

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3 | Law interned in the camps

The launch of legal studies at the two university camps was basically the result of a misunderstanding about the languages taught. It was assumed that in Freiburg it was only possible to study in French, so the German-speaking internees ended up in the care of the Zurich universities.^[22] In addition to other students, lawyers were also sent to the Winterthur camp. By the time it was established that they could in fact study in the Freiburg camp, it was already overcrowded. It was therefore necessary to create a legal group, organised by the Faculty of Legal and Administrative Sciences at the University of Zurich.^[23] Vetulani also mentioned this problem, pointing to his efforts to group all the “lawyers” together in Freiburg. This action was perceived as going against the position expressed by Paul Niggli, the rector of the University of Zurich.^[24]

It was originally planned that the university camps, using the education of the interned soldiers, would be able to provide teaching staff on their own. However, the number of qualified people proved to be insufficient.^[25] It soon became apparent that, despite the internment of many members of the judiciary or civil servants assigned to the university camps, preparing a “Polish” curriculum proved to be a challenge. Many of the interned lawyers were practitioners with no teaching experience or theoretical preparation to teach younger law adepts.

²² AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, *projekt sprawozdania z działalności Komisji Rekrutacyjnej i organizacji studiów prawniczych w obozie uniwersyteckim we Fryburgu* (draft report on the activities of the Recruitment Committee and organisation of legal studies at the university camp in Freiburg, by Adam Vetulani), dated 23 October 1940, 1.

²³ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 302.

²⁴ Vetulani, “Poza płomieniami,” 65.

²⁵ Vetulani, “Poza płomieniami,” 60.

4 | Wintherthur camp

The information on how the legal studies programme was created and implemented at the Wintethur camp is mainly provided by the reports from the Polish academic authorities.^[26] The first document of this type is the *Report of the Academic Director of the Winterthur Student Camp* by Capt. Tadeusz Keller^[27], for the academic year 1940/41^[28], drafted in February 1942. It indicated that, for all the courses taught within the camp, as a result of a number of factors, it was neither possible to apply the division of academic subjects in accordance with the Polish system^[29], nor the Swiss one, a situation which necessitated the use of a simplified system. Students were divided into two groups: beginners and seniors.^[30]

²⁶ An order of 7 May 1943 required camp leaders to send reports, prepared according to the indicated scheme. The first camp reports prepared in this way concerned the academic year 1941/1942 and the first semester of the year 1942/1943. The academic director sent them at the end of June 1943 to the commander of the university and school camp groupings, Colonel Klaudiusz Reder, who then forwarded the report to the commander's staff in Elgg on 6 July 1943. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, no card number, *pismo przewodnie z dnia 29 czerwca 1943 r. autorstwa Tadeusza Kellera* (covering letter dated 29 June 1943 by Tadeusz Keller), Winterthur, p. 1. In the case of the reports, the cooperation of the military leadership with the "scientific division" is evident. On the military division of the camps, see Marek Żejmo, "Druga Dywizja Strzelców Pieszych gen. Prugar-Ketlinga internowana w Szwajcarii podczas II wojny światowej" *Historia Slavorum Occidentis*, vol. 6 (2014): 135-152.

²⁷ Physician, doctor of medical sciences, associate professor at the Jagiellonian University. The position of scientific director was the equivalent of the Polish rector, overseeing scientific and didactic matters at the camp. The group leaders, i.e. the persons appointed to supervise the studies conducted, were subordinate to him. Drobny, "Walka bez oręża," 136-137.

²⁸ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, cards nos. 218-222. The report for the academic year 1940/1941, by Tadeusz Keller, is dated 14 November 1941. [card no. 219], while a covering letter from the commander of the Winterthur student camp, Lieutenant Colonel Jan Narzyski, addressing the report to the division commander, is dated 16 February 1942. Drobny, "Walka bez oręża," 136 indicated that at the Winterthur camp, a scientific director was not appointed until after the camp had been in operation for a year. In his report, Tadeusz Keller gives 10 September 1941 as the date he took up his post.

²⁹ The study of law according to the Polish programme lasted four years and ended with a Master of Laws degree.

³⁰ This division unfortunately implied an adjustment of the level of teaching to the weaker students in each group. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 219, *Sprawozdanie Dyrektora Naukowego obozu studenckiego Winterthur*, 1.

What is worth highlighting is that, according to data from the annexes to the *Winterthur Camp Law Group's General Report*^[31], written by Capt. Jakub Merunowicz^[32], there were ten students in the beginners group, to which soldiers who had just started their legal education before the outbreak of war or had interrupted it at an early stage were assigned.^[33] In the older group, eight students were enrolled, most of whom had completed two years of Polish legal studies before.^[34] For them, fifteen members of staff from the Faculty of Law at the University of Zurich, including nine

³¹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, cards nos. 302-315.

³² A graduate in law from the Jagiellonian University in 1928, doctorate in 1930, before World War II a sub-prosecutor at the Regional Court in Katowice.

³³ Seven students qualified for the first year of law, while three students qualified for the second year. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 306, *Formularz nr 1*. A compilation of the names of first and second-year students, giving their results from the Roman Law exam, as well as the money markets exam, shows that the following were qualified for the first year: Wincenty Grabiński, Józef Matyjasik and Feliks Musialik (students at the Jagiellonian University in Cracow), Euzebiusz Lajtner (a student at the Warsaw University), Paweł Miglus and Jerzy Piechowicz (who did not undertake their studies in Poland), and Marek Różycki (a 47-year-old with a degree in philosophy). Interestingly, in the assumptions prepared for Colonel Lederrey on which the activities of the selection committee were to be based, it was acknowledged that candidates over the age of 30 would be disqualified. CAW in Warsaw, ref. II.50, 2 DSP, vol. 503, card no. 6 (in French) and 16 (in Polish). Second-year students were to sit examinations in money markets, according to the note under the statement. They were: Marian Pojnar (a student at the Lviv University), Zdzisław Wójcik (a student at the Jagiellonian University in Cracow) and Zbigniew Nieszkodny (a student at the Lviv University), with whom it was probably mistakenly indicated that he was taking Roman law, although it was also noted that he had been in his second year before the war. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 307, *Abecadłowy wykaz imienny studentów [...] Grupa pierwsza obejmująca studentów 1 i 2 roku studiów*, 1.

³⁴ Six students were enrolled in the third year of law, two in the fourth year, and no fifth year was created. CAW in Warszawie, ref. II.50, 2 DSP, vol. 1792, card no. 306, *Formularz nr 1*. The following should be classified as third-year students: Stefan Bijowski, Tadeusz Sarnecki and Władysław Zarębski (students at the Lviv University), Tadeusz Blewąski (student at the Warsaw University) and Stanisław Opoka (student at the Jagiellonian University in Cracow). They took examinations with Swiss professors in bond law, non-contractual indemnity law, administrative law, and an examination in taxation, except Stefan Bijowski, who left the camp before the examinations. Two fourth-year students, Wojcieck Danielewicz (a student at the Lviv University) and Zygmunt Luciak (a student at the Warsaw University) took examinations in the fields of liabilities and damages. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 308, *Abecadłowy wykaz imienny studentów [...] Grupa druga obejmująca studentów 3 i 4 roku studiów*, 1.

professors, commuted to the Winterthur camp every week.^[35] The Polish assistants included a group of twenty-five soldiers who were law graduates, some of whom said they intended to work on their PhDs.^[36]

Jakub Merunowicz, the supervisor of the lawyer group, prepared a list of subjects for each group in the Winterthur Camp Law Group's General Report.^[37] First- and second-year students, i.e. the younger group, acquired knowledge of Roman law, the philosophy of law, ecclesiastical law and political law. They also attended classes on economic relations in the broadest sense: economics, national and economic policy, the economic history of Europe, money and credit markets, banking, and financial instruments.^[38] These classes were conducted for them by Swiss scholars, commuting weekly to the camp.^[39] Polish lecturers, on the other hand, taught classes in legal theory and the law of nations. The senior group studied, according to the Swiss programme, civil code, bond law, non-contractual damages law, administrative law and administrative control sciences, as well as the general part of criminal law.^[40] Of the subjects on the Polish programme, Polish criminal law was taught, as well as civil trial and criminal trial. As Capt. Merunowicz explained, the Swiss cantons had separate procedures, hence it was considered of little use for Polish soldiers to study the regulations of the canton of Zurich.^[41]

³⁵ The involvement of Swiss academics can be found in the "Yearbook 1940/1941" published by the University of Zurich, where it is indicated that four hundred interned students (one hundred of them in academic subjects) were studying under the auspices of the university and polytechnic, and 40 associate professors working at the university were teaching in the camp. Jahresbericht 1940/1941, p. 24. <https://www.archiv.uzh.ch/de/editionen/jahresberichte.html>.

³⁶ The graduates were divided into four sections: administrative, fiscal, civil-criminal and economic. Their duties included attending seminars, but also listening to at least 10 hours of lectures on Swiss law. Cf. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, card no. 256.

³⁷ Cf. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, cards nos. 92-93, Verzeichnis der Vorlesungen und Uebungen im Wintersemester 1940/41.

³⁸ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 310, Wykaz profesorów, docentów oraz wykładowców szwajcarskich.

³⁹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 309, Formularz nr 2: grupa początkująca.

⁴⁰ For a list of subjects with the names of instructors and the number of hours per week, see CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 311, Formularz nr 2: grupa starsza.

⁴¹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 312.

The second academic year of the functioning of the legal studies, 1941/1942, brought some changes. In each faculty, the studies were extended by one year, which was intended to allow the education to be supplemented by subjects that had not been taught in the previous year.^[42] The camp student books were introduced, which were intended to help Polish universities to recognise exams passed or studies completed in the future.^[43] Tadeusz Keller complained about the personnel problems at Swiss universities, where almost half of the assistants had been called up for military service and it was impossible to recruit new lecturers. This also affected the organisation of teaching in the camp:

[...] For this reason, and at the suggestion of several Swiss professors, a number of lectures and classes were moved to Zurich with the agreement of the university and military authorities. Consequently, students go there in compact groups, with the authorities, however, limiting these trips to twice a week for individual groups.^[44]

However, it is difficult to determine from the Polish documents whether the law group also attended lectures within the actual university walls. Although the report on the functioning of the camp in the academic year 1941/1942 contains a study plan with an indication of the day and time of the lectures, it refers to the camp premises.^[45]

The academic year 1942/1943 did not bring major changes to the situation of the students in relation to the camp as a whole, but the situation of the law students improved.^[46] The Swiss Internment Committee again refused

⁴² CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 220, Sprawozdanie Dyrektora Naukowego obozu studenckiego Winterthur, 2.

⁴³ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 222, Sprawozdanie Dyrektora Naukowego obozu studenckiego Winterthur, 5.

⁴⁴ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 221: "[...] Z tego też powodu na propozycję wielu profesorów szwajcarskich i za zgodą władz uniwersyteckich i wojskowych pewna ilość wykładów i ćwiczeń przeniesiona została do Zurychu. W związku z tym udają się tam studenci w zwartych grupach, przy czym jednak władze ograniczają te wyjazdy do dwu razy w tygodniu dla poszczególnych grup."

⁴⁵ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1761, card no. 215, *Verzeichnis der Vorlesungen und Uebungen im Sommersemester 1941*, 15. Cf. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, card no. 256.

⁴⁶ Already in October 1942, Tadeusz Keller, together with the academic heads of the individual faculties, issued an appeal that the intentions of the Internment Committee on the plan to reduce the daily departures of students from 120 to

to allow the matriculation of internees at the Polytechnic School, but succeeded in matriculating ten law students at the University of Zurich.^[47] In the reports submitted to the command, the timetable of the law group is missing, which may mean that classes with the Swiss staff were no longer held at the camp. What is worth noting is that in the report for the summer semester of the academic year 1942/1943, we find that the law department did not accept any new students, and that those interested were sent to Freiburg.^[48]

Among the reports collected in the Central Military Archives, the full report for the academic year 1943/1944 is missing. One certain clue is a note sent to the commander of the university camp by the director of sciences, Tadeusz Keller^[49], to which he enclosed a list of Polish lecturers and assistants accepted by Colonel Max Zeller. Among the lawyers listed there were the names of Zygfryd Synoradzki, Mieczysław Wyderko, Leszek Szoblik and Janusz Rakowski.^[50]

The report on the functioning of the law group for the summer semester of 1944, dated 28 November 1944, states that “all lawyers and economists attended lectures in Zurich, as separate lectures were not held in Winterthur, and for this reason there were no Polish or Swiss lecturers”^[51] The author of the report, the scientific leader of the group and platoon commander Zygyrd Synoradzki, indicated that the studies were taking place “according to the promotional ordination plan of the University

50 would result in jeopardising the continuation of studies for the majority of the internees. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, card no. 120. With such restrictions, 11 out of 15 soldiers would have to give up studying law. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, card no. 130, letter from Zygmunt Synoradzki, dated 13 October 1942, 1. The appeal was also drafted in French. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1778, cards nos. 132-142.

⁴⁷ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1761, card no. 20, Report on the activities and scientific organisation of the university camp for the academic year 1941/42 and the first semester of the year 1942/3, 1, dated 28 June 1943.

⁴⁸ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1761, card no. 12, Report for the summer semester 1943, dated 3 December 1943, 1.

⁴⁹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1761, card no. 7. The list in German contains the personal details of Z. Synoradzki, his name is missing from the list in Polish [card no. 6].

⁵⁰ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1761, card no. 9. Note by vol. Keller, Winterthur, 15 October 1940.

⁵¹ It also reports that the number of law students in the summer semester of 1944 was 21 soldiers. CAW in Warsaw, ref. II.50, vol. 1792, card no. 23, Report of 28 November 1941, 1.

of Zurich.”^[52] Similarly, in his February 1945 report, he stated that “lawyers and economists studied as regular students at the University of Zurich.”^[53] He observed, however, that “a certain group, especially older doctoral students who have already completed their studies in Poland, do not attach much importance to the additional examination at the University of Zurich and therefore do not work very hard in this direction.”^[54]

Both the report for the 1943/44 academic year and the report for the winter semester of 1944/45 state that “studies are held according to the promotional ordinance plan of the University of Zurich” and that there are no separate Polish lectures.^[55] Therefore, it appears that the last semester in which Polish lectures could be delivered was the winter semester of 1943/1944. Thus, it is clear that from a mixed system, the legal studies for the internees at Winterthur evolved into studies according to the Zurich Ordinance. Does this mean that the Polish soldiers received diplomas from the University of Zurich? The lists of graduates include those who graduated from the University of Zurich with a Doctor of Laws degree.^[56] If we take a look at the list of graduates, we can see a number of people who in 1940 were either enrolled in the senior group of legal studies or were assistants, holding pre-war master’s degrees.^[57]

So where are the other law students starting their studies at the Winterthur camp? In Freiburg. According to the 1944 lists, nine students from the junior group and one student from the senior group at the Winterthur camp obtained their bachelor’s degree in accordance with the Freiburg

⁵² Ibidem, 2.

⁵³ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 26.

⁵⁴ Ibidem.

⁵⁵ In addition, the report confirms that law students were doctoral students, obliged according to Zurich regulations to attend lectures for a minimum of three semesters at the University, provided they had previously completed at least eight semesters at another university.

⁵⁶ Among those who were to complete their studies at the Winterthur Camp, Adam Szeworski and Marek Różycki were listed under law, but a doctorate in economics was indicated as the degree obtained. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 12, Lista imienna żołnierzy studentów, którzy ukończyli studia wyższe w Obozie Winterthur (Name list of student soldiers who completed their higher education at Camp Winterthur), dated 23 February 1945, 1.

⁵⁷ Drobny, “Walka bez oręża,” 325.

Ordinance.^[58] Therefore, it is worth taking a look at the solutions introduced by this university camp at this point.

5 | Freiburg

In 1940, the law students assigned to the university camp in Grangeneuve were divided into three groups, in accordance with the study regulations in force at the University of Freiburg. For the internal organisation of the camp, it was additionally indicated which students were to be included in the fourth year according to the Polish programme, in order to meet the requirements set by the law faculties of Polish universities.^[59] Fifteen students were enrolled in the first year, four in the second year, and seven soldiers were enrolled in the third and fourth years.^[60] The students' duties included attending classes by Swiss professors coming to the camp, as well as classes taught by the Polish staff. It is important to note that there were many more Polish law classes in Freiburg than in Winterthur.

First-year law students at the Grangenève camp attended classes in Roman law, the history of law in Western Europe, and natural law. These

⁵⁸ In July 1943, Feliks Musialik and Paweł Miglus obtained their bachelor's degrees. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 35, List of names of students, compiled in June 1943. Notes on the dates of the bachelor's degrees were added by hand. Further Bachelor's degrees were obtained in January 1944 by Zbigniew Nieszkodny, Józef Matyjasik, Marian Pojnar and Zdzisław Wójcik, also admitted to the Winterthur camp in 1940. CAW in Warsaw, ref. II.50, 2 DSP, vol. 201, card no. 78, Zestawienie statystyczne wyników sekcji egzaminacyjnej w styczniu 1944 (the Statistical Statement of Results of the Examination Section in January 1944), 1. The statement of 7 December 1944 also indicates Eusebiusz Lajtner and Jerzy Piechowicz. CAW in Warsaw, ref. II.50, 2 DSP, vol. 201, card no. 111, Wykaz studentów obozu uniwersyteckiego Fribourg, dated 7 December 1944, p. 1-2. Cf. n. 30. In the compilation for the academic year 1941/1942 of the Freiburg camp, they are not yet on the lists of students. CAW in Warsaw, ref. II.50, 2 DSP, vol. 201, card no. 21, Name list of students, dated 1 February 1942, p. 1. They must therefore have been transferred to Freiburg in the academic year 1942/43. It therefore appears that in 1942, on the occasion of the matriculation of some law students, the others were transferred to Freiburg.

⁵⁹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 35, Appendix to the report for the academic year 1941/42 and the first semester 1942/43, 1. This report was prepared by Jerzy Brzozowski, as dean of the camp, in June 1943.

⁶⁰ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 106, Form no. II, 1.

were taught by Swiss professors. Second-year students dealt with selected topics in political economy, Swiss contract law, civil law and family and inheritance law. Third- and fourth-year students also attended lectures on Swiss contract law and civil law, as well as philosophy of law, Swiss commercial law, private international law and general principles of civil procedure. These were subjects that were described as compulsory, written into the minimum programme that Swiss young people had to complete with examinations in order to receive a bachelor's degree in law.^[61] Polish staff taught introduction to the study of law, history of the Polish legal system, and the law of nations to the students in the first year^[62], ecclesiastical law and monetary science were intended for the second year, and in addition, classes in Swiss family law and inheritance law were held in the Polish language for the second-, third- and fourth-year students.^[63]

In addition, from the academic year 1941/1942, students at the camp's university listened to lectures on criminal law and criminal procedure (cantonal), as well as Swiss state law and statistics. The extension of the legal studies programme to include further subjects may have been related to the camp's relocation from Grangeneuve to Freiburg, but was primarily due to the university's agreement to allow the internees to attend classes as free students.^[64] Administrative law, fiscal law, criminal law and criminal procedure were additionally launched within the Polish study programme.^[65]

The examinations were organised differently at the Winterhur camp. While the university camp operating under the aegis of the University of Zurich prepared for individual examinations, separate for each subject,

⁶¹ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 107, Form no. III, 1. Drobny 1985, 174–175.

⁶² The law of nations was also a compulsory subject for the Swiss programme, but it was taught in the camp by a Polish civilian refugee, Antoni Deryng, a pre-war professor and dean of the law faculty of the University of Lublin. Wojciech Staszewski, "Antoni Deryng (1901 – 1978)", [in:] *Profesorowie Prawa Katolickiego Uniwersytetu Lubelskiego*. ed. Antoni Dębiński, Wojciech Sz. Staszewski, Monika Wójcik (Lublin: Wydawnictwo KUL, 2006), 72.

⁶³ AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, Załącznik II: Wykonany program wykładów na Wydziale prawnym Uniwersytetu polowego w Grangeneuve (Appendix II: Executed programme of lectures at the Law Faculty of the Field University of Grangeneuve), dated 17 February 1941, p. 1. Cf. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 106, Form no. II, p. 1, where it is further indicated that the lectures began on 3 November 1940 and ended on 20 July 1941.

⁶⁴ Vetulani, "Poza płomieniami," 133.

⁶⁵ CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 107, Formularz nr III (Form no. III), 1.

the Freiburg camp was to take examinations in thematic blocks, where committees – a separate one for the Swiss study programme and a separate one for the Polish subjects – asked questions on the subjects for each year of study.^[66]

As in other university camps, the Freiburg camp had to seek from the university in charge to matriculate its students and to have their results recognised as equivalent to those of the students learning within the walls of the university. The first step in this direction was to obtain permission for students to attend lectures and seminars from the academic year 1941/42 onwards.^[67] Another step included the necessity for Poles to pass examinations in “Swiss studies” in front of a regular examination board, while leaving the organisation of examinations in the Polish part of the study programme to the Polish camp authorities. As a nod to earlier promises, their books – the Swiss ones, not the camp ones – were supplemented with their results from the 1941/1942 academic year onwards, i.e. from the moment they were allowed to attend classes as free students.^[68]

6 | The purpose of legal studies

On the occasion of the inauguration of the camps, General Prugar-Ketling issued an appeal to student soldiers, which reads as follows:

[...] By giving you the opportunity to conduct your studies, I am also expressing my confidence that, even in non-military conditions, you will be able to maintain internal and external discipline through your own spiritual discipline. [...] It is your duty to acquire as much knowledge as possible so

⁶⁶ E.g. CAW in Warsaw, ref. II.50, 2 DSP, vol. 1816, card no. 8, Zestawienie statystyczne egzaminów sesji egzam. marcowej (Statistical statement of examinations of the March examination session), dated 27 March 1944, 1.

⁶⁷ AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, List Adama Vetulaniego do Jana Hulewicza (Letter from Adam Vetulani to Jan Hulewicz, dated 30 April 1941). Cf. AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, Projekt notatki dla prof. Siegwarta (Draft letter from Adam Vetulani to Prof. Siegwart dated 23 May 1944), 6.

⁶⁸ Vetulani, “Poza płomieniami,” 175-176. AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, Projekt notatki dla prof. Siegwarta (Draft letter from Adam Vetulani to Prof. Siegwart dated 23 May 1944), 6. Cf. Drobny, “Walka bez oręża,” 168-171.

that you can dedicate your knowledge, as well as your enthusiasm, to the service of the Fatherland. I am aware that the troops may temporarily suffer as a result of your departure to study in such large numbers. However, if I have agreed to this, it is only in the hope that Poland will benefit even more from it one day.^[69]

The General's words clearly indicate the purpose of launching the studies, and the field of law was ideally suited to the plan to return educated soldiers to their homeland. As with the other aforementioned university centres abroad, the Polish law schools in Switzerland were tasked with preparing future personnel to work in and for a liberated Poland.

Feeling called and obliged to take an active role in regulating the status of students, in November 1941, Vetulani, as he himself indicated, prepared a petition to the Ministry of Religious Denominations and Public Enlightenment, in which he demanded that "the Government of the Republic recognise the university examination certificates taken by soldiers interned in university camps in Switzerland."^[70] He further specified that he was requesting that the Ministry to recognise that:

1. Certificates of successful completion of the first-year examinations at the Faculty of Law of the Field University of Grangeneuve

⁶⁹ Władysław Drobny, *Karabin i książka (Polskie Liceum w Szwajcarii 1940-1944)* (Warszawa: Wydawnictwo Ministerstwa Obrony Narodowej, 1973), 49-50: „[...] Dając wam możliwość prowadzenia studiów, dałem wam równocześnie wyraz mojego zaufania, że i w tych nie czysto wojskowych warunkach potrafcie, dzięki własnej dyscyplinie duchowej, utrzymać należytą karność wewnętrzną i zewnętrzną [...] Macie obowiązek pracy nad zdobyciem jak największej ilości wiedzy, aby móc i tę wiedzę również, a nie tylko wasz zapał, oddać w pełni na usługi Ojczyzny. Wiem, że chwilowo może nawet oddziały ucierpią na tym, że w tak dużej liczbie odeszliście na studia. Jeśli się na to zgodziłem, to tylko w nadziei, że kiedyś przez to Polska większą jeszcze korzyść odniesie.”

⁷⁰ AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, Adam Vetulani's application for recognition of certificates of Field Universities, dated February 1941. [date of day illegible], p. 1. A copy of the letter is in CAW in Warsaw, ref. II.50, 2 DSP, vol. 1814, cards nos. 9-16. Before the application reached the Ministry, however, Vetulani is said to have received a private letter from Stanisław Kot, dashing his hopes for a successful outcome. He mentions this in his letter to the "minister," asking for a deliberation on intervening in the subject. From the context, one must infer that this is a letter to Alexander Ładoś. AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, Letter from Adam Vetulani, dated 30 April 1941, p. 1.

in Switzerland are equivalent to the corresponding certificates of the Faculties of Law of the state universities of Poland.

2. Certificates of successful completion of the second- and third-year examinations at the Faculty of Law of the Field University of Grangeneuve in Switzerland for exemption from the examinations of the subjects mentioned in the certificate at the Law Faculties of the State Universities of Poland.
3. Certificates from the Faculty of Law at the Field University of Grangeneuve in Switzerland are equivalent to the certificates of the Master of Laws of Polish Universities.^[71]

Significantly, despite the general wording at the beginning of the letter, the author made it clear that he was limiting the group of beneficiaries to those studying law at the Grangeneuve camp. He argued that they were the only ones who had had the subjects of Polish law taught comprehensively and in line with the requirements of Polish universities. He added, however, that there was no obstacle to law students from Winterthur being allowed to take examinations before the Grangeneuve board. Although these intentions secured the interests of only a narrow group of students – lawyers, and only from one camp at that – it is possible to infer from them the goal of one of the organisers of studies for the internees. This confirms the thesis that, in the opinion of their creators, the university camps were intended to prepare soldiers for their return to the country, where they were to become involved in the social and public life of the reborn homeland.

Notes of scepticism about the purpose of teaching law were palpable in the Winterthur camp. Keller gave vent to doubts, in the pages of his report on the academic year 1941/1942, as to whether Polish regulations on the recognition of the realisation of the study programme would allow Polish

⁷¹ AN PAN and PAU in Cracow, ref. K-58, AV's legacy, vol. 140, draft of Adam Vetulani's proposal for recognition of certificates of Field Universities, dated February 1941. [date of day illegible], p. 7: "1. Świadectwa ze złożonych pomyślnie egzaminów I roku studiów na Wydziale Prawa Uniwersytetu Polowego w Grangeneuve w Szwajcarii za równoważne odpowiednim świadectwom Wydziałów Prawa Państwowych Uniwersytetów polskich. 2. Świadectwa z pomyślnie złożonych egzaminów z II i III roku prawa Wydziału Prawa Uniwersytetu Polowego w Grangeneuve w Szwajcarii za zwalniające od składania na Wydziałach Prawa Państwowych Uniwersytetów Polskich egzaminów z przedmiotów wymienionych w świadectwie. 3. Świadectwa z ukończenia Wydziału Prawa Uniwersytetu Polowego w Grangeneuve w Szwajcarii za równoznaczne z świadectwami Magistrów Prawa Uniwersytetów Polskich."

universities to give credit for the grades earned, or to validate degrees altogether. He suggested that these matters might be dealt with separately for each course of study at the camp. He also raised concerns about Swiss universities recognising the performance of interned students. However, he acknowledged that the atmosphere in the university camp was more positive than in ordinary camps, which was valuable in itself.^[72]

In 1943, Vetulani wrote to Minister Stanisław Kot, asking for a final decision confirming that the examinations taken by students in university camps would be recognised by Polish universities and would not require future validation. He also pointed to a similar problem in the case of doctoral diplomas. It is clear from the letter that it concerns all fields of study and camps.^[73]

The need to build up human resources was recognised by Aleksander Ładoś. While in the Freiburg camp in December 1944, he and a representative of the Ministry of the Interior in London stressed how important it was for soldiers to apply themselves to learning during their internment, and to use the knowledge they gained in Poland in the future. Vetulani added that, although he himself was not present at the talks between the government representatives and the soldiers, according to the reports he received, “the interpretation of the speeches went in the direction that the obligation to study and prepare for a future profession comes before the immediate reporting for active duty.”^[74] However, this did not solve the problem of recognising the value of the performance of Polish soldiers in the future in Poland.

The position of the Polish Government in London was quoted by Tadeusz Keller when explaining in writing to members of the Brotherly Aid in the Winterthur camp. The camp’s director of science indicated that the Polish Embassy in Bern had already received a telegram in 1941 with the government’s decision, which stated: “the position ... on the studies ... and the recognition of them [...] as equivalent to studies taken and examinations

⁷² CAW in Warsaw, ref. II.50, 2 DSP, vol. 1792, card no. 221, Sprawozdanie Dyrektora Naukowego obozu studenckiego Winterthur, p. 4.

⁷³ AN PAN i PAU w Krakowie, ref. K-58, spuścizna AV, vol. 140, List Adama Vetulaniego do Stanisława Kota, datowany 16 maja 1943 r., p. 1.

⁷⁴ CAW in Warsaw, ref. II.50, 2 DSP, vol. 201, card no. 112, Report of Adam Vetulani, dated 3 December 1944, p. 1. It is interesting to note that one of Vetulani’s closer associates, a pre-war member of the Faculty of Law at the Jagiellonian University in Warsaw, Jan Świda, left the camp a few days before his habilitation colloquium to actively join the struggle against the Germans. Drobny, “Walka bez oręża,” 183.

taken at the national universities is entirely favourable.”^[75] Keller went on to explain that there was no possibility of issuing an act ordering Polish universities to honour diplomas and exams earned by interned soldiers due to the autonomy of Polish universities.^[76] The matriculation of students at Swiss universities seemingly eliminated this problem. The acquisition of university diplomas by interned soldiers enabled them to validate their degrees and titles, not only in Poland. It also allowed the soldiers remaining in exile to have their academic efforts recognised.

The declarations that it would be the students’ duty to work for the reconstruction of the country did not, however, mean that at the end of the war, the commander of the 2nd DSP, General Bronisław Prugar-Ketling, would order the students to return immediately to their homeland. Armed with lists prepared by the Polish staff of the camps, he appealed to Aleksander Ładoś for help in convincing the Swiss authorities of the need to secure the maintenance costs of students and academics^[77], exempted in 1945 from the obligation to return to the country by virtue of a decision of the Ministry of National Defence of the Polish Government in London.^[78]

7 | Conclusion

The models of legal education that developed within the structures of the camps for Polish soldiers interned in Switzerland were not perfect. There was a lack of consistency in activities, and the study programmes and

⁷⁵ The declaration of the government was later to be confirmed by the Minister of Religious Denominations and Public Enlightenment in the years 1943-1944, Rev. Zygmunt Kaczyński. CAW in Warsaw, ref. II.50, 2 DSP, vol. 201, card no. 100, letter from Tadeusz Keller to members of the Brotherly Aid of the Winterthur camp, dated 7 July 1944, p. 2.

⁷⁶ Ibidem.

⁷⁷ CAW in Warsaw, ref. II.50, 2 DSP, vol. 235, cards no. 1-4.

⁷⁸ It is another matter that the command also agreed, in individual cases, to abolish the obligation to return to the country in situations where soldiers indicated a desire to go into exile for reasons that did not recognise the provisional government in Lublin and the unfolding future of Poland. Soldiers approached the general with requests to stay in Switzerland (CAW in Warsaw, ref. II.50, 2 DSP, vol. 235, card no. 103) or go to the United States (CAW in Warsaw, ref. II.50, 2 DSP, vol. 235, card no. 107).

their realisation seem to have been a mixture of several factors. However, after analysing the available archival materials and the memories of the participants of the events, it is possible to demonstrate that the model of teaching law in the Winterthur camp should be divided into three phases. The first would be the simplified mode, i.e. the merger of the pre-war first- and second-year law students into a junior group, and the third- and fourth-year students into a senior group. The next phase, the beginning of which we can observe in the academic year 1941/1942, is the camp studies, but with the status of free students at the Faculty of Law of the University of Zurich. The final phase began in the 1942/1943 academic year, when the internees were allowed to enrol at the University of Zurich and become fully-fledged law students. A small number of law graduates can boast of having obtained a doctorate in law.

The more numerous group of law students at the Grangeneuve camp and later at Freiburg also experienced a changing model of legal education. Initially, in the academic year 1940/1941, a mixed system was imposed on them, which was a combination of the three-year undergraduate course offered to its students by the Freiburg University and the four-year legal studies that were conducted in Poland. Students from the Freiburg camp became free students in the academic year 1941/1942, but they had to wait until 1944 for the final phase, when their matriculation took place. The Freiburg camp, however, unlike the law faculty at Winterthur, did not terminate the subjects in the Polish curriculum. On the contrary, it maintained lectures and examinations on Polish law until the end of its activities, giving students the opportunity to learn the subjects required before the war at the national universities. Unfortunately, however, there are fewer reports on the activities of this camp, making many issues not sufficiently clear.

Looking comprehensively at the teaching of law in the camps and the transformation of models of legal education, it can be seen that a specific system eventually developed and the universities complemented each other. The first step towards a legal education could be an education in Freiburg, where it was possible to obtain a bachelor's degree, as well as to complete law studies in accordance with the Polish curriculum. More ambitious students could obtain a doctorate in law in Freiburg or Winterthur.

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