

**CODE OF GOOD PRACTICES AND COMMON MISTAKES  
IN INTERNAL REGULATIONS OF THE DOCTORATE-AWARDING ENTITIES  
REGARDING PROCEEDINGS FOR THE AWARDING  
OF THE DOCTORAL DEGREE**

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## TABLE OF CONTENTS

### Spis treści

<u>INTRODUCTION</u> .....	2
<u>1. GENERAL COMMENTS</u> .....	3
<u>2. APPOINTMENT AND CHANGE OF A SUPERVISOR(S) AND – IF APPLICABLE – AN AUXILIARY SUPERVISOR FOR EXTRAMURAL DOCTORAL CANDIDATES</u> .....	4
<u>3. DETERMINATION OF THE FEE FOR PROCEEDINGS IN THE EXTRAMURAL MODE AND THE RULES FOR EXEMPTION FROM THIS FEE</u> .....	5
<u>4. SUBMISSION OF THE DISSERTATION</u> .....	7
<u>5. APPOINTMENT AND THE SCOPE OF TASKS OF THE DEDICATED DOCTORAL COMMITTEE</u> .....	7
<u>6. APPOINTMENT OF REVIEWERS</u> .....	9
<u>8. VERIFICATION OF THE TRACK RECORD (SCIENTIFIC PUBLICATION) REQUIREMENT IN CASE OF MULTI-AUTHOR PUBLICATIONS</u> .....	11
<u>9. OTHER REQUIREMENTS FOR ADMISSION TO THE DEFENCE AND AWARDED OF THE DOCTORAL DEGREE</u> .....	12
<u>11. PUBLICATION OF INTERNAL REGULATIONS</u> .....	13

## INTRODUCTION

With the entry into force of the Act of 20 July 2018. - Law on Higher Education and Science (Journal of Laws of 2023, item 742, “**HESL**”), there has been a significant shift in regulation of the proceedings for awarding of the doctoral degree. Under the Act of 14 March 2003 on scientific degrees and academic title and degrees and title in art (Journal of Laws of 2017, item 1789, “**Degrees Act**”) the old doctoral procedure was regulated uniformly in all the higher education and science entities in Poland by the Degrees Act and the regulation of the minister issued based on art. 31 of the Degrees Act.

Under the HESL each doctorate-awarding entity is obliged to issue its own internal regulations governing the conduct of the proceedings for the awarding of the doctoral degree (art. 192(2) of the HESL). Such regulation should be issued by the senate of the university or by the scientific council (when the doctorate-granting entity is an institute of the Polish Academy of Sciences, a research institute, or an international institute). This solution further strengthens the autonomy of the higher education institutions in accordance with art. 70(5) of the Constitution of the Republic of Poland of 2 April 1997 (Journal of Laws, item 483 as amended).

The internal regulations may account for the specifics of a given entity to a greater extent than a ministerial regulation. However, the diversity of regulations adopted by the doctorate-awarding entities became a subject of criticism in the literature.<sup>1</sup>

The diversity of these procedures has become the main reason for the protractedness of the appeal proceedings by the Council of Scientific Excellence, which has to control the compliance of the decision appealed against not only with the provisions of the HESL, but also with the provisions of the internal regulations.

In accordance with art. 192(2) of the HESL, the internal regulation of the proceedings for the awarding of the doctoral degree should include, in particular, provisions on:

- 1) appointment and change of a supervisor(s) and – if applicable – an auxiliary supervisor for extramural doctoral candidates;
- 2) determination of the fee for proceedings in the extramural mode and the rules for exemption from this fee;
- 3) submission of the dissertation;

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<sup>1</sup> M. Wojtuń, *Procedural fairness in promotion proceedings*, "Państwo i Prawo" 2021, No. 2, p. 10

- 4) appointment and the scope of tasks of the dedicated doctoral committee;
- 5) appointment of reviewers;
- 6) verification of learning outcomes for qualifications at PQF<sup>2</sup> level 8 for extramural doctoral candidates;
- 7) verification of the track record (scientific publication) requirement in case of multi-author publications.

Obviously, doctorate-awarding entities in their internal regulations cannot include any provisions that would be contradictory to the parliamentary statutes, including primarily, the HESL, the Code of Administrative Proceedings or the Polish Language Act.<sup>3</sup>

This is further stressed by art. 238(1)(6)(a) and 239(2) of the HESL, according to which, the Council of Scientific Excellence supervise the legality of internal resolutions regulating the proceedings for the awarding of the doctoral degree. The Council – in case of the violation of the law – declare these internal regulations invalid.

In individual cases, the provisions of the internal regulations that are contrary to the statutes shall not be applied pursuant to the conflict of laws rule *lex superior derogat legi inferiori*.<sup>4</sup>

Given their significance, it therefore became necessary to subject these internal resolutions of the doctorate-awarding entities to analysis, which was undertaken by the Polish National Association of Doctoral Candidates. The Association is a statutory representation of all doctoral candidates in the Republic of Poland, with the right to express opinions and present motions in matters concerning all doctoral candidates (art. 339(1) and 339(2) of the HESL).

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The culmination of the analyses of the internal regulations is this Code of Good Practices and Common Mistakes. It contains recommendations of legal solutions provided in the internal regulations of doctorate-

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<sup>2</sup> PQF stands for Polish Qualification Framework (pol. *Polska Rama Kwalifikacji*).

<sup>3</sup> Ł. Kierznowski, *Degrees and degrees in art. Commentary*, Warsaw 2021, p. 182

<sup>4</sup> Ł. Kierznowski, *Degrees...*, p. 182.

awarding entities, which can be deemed as positive from the perspective of the quality and fairness of the proceeding for the awarding of the doctoral degree.

## 1. GENERAL COMMENTS

Firstly, drafting internal regulations, the doctorate-awarding entity should follow the principles of legislative technique, stemming from the Regulation of the Prime Minister on "Principles of legislative technique" (Journal of Laws 2016, item 283). For example, par. 21 and par. 141 of this regulation indicate an order in which the provisions of the internal regulations should be placed. That is: substantive law, organisational system, procedural law, and penalties (of course, there will be none of these in these resolutions). The doctorate-awarding entity, drafting its internal regulation does not, generally, must follow the order of provisions indicated by art. 192(2) of the HESL.

The internal regulation affects all doctoral candidates, but two groups should be distinguished: candidates from an extramural mode and graduates of doctoral schools. The regulation consists of some provisions that are applied only to the latter group (including 3 of the 7 mandatory elements of these group). These are, in particular, provisions on:

- 1) appointment and change of a supervisor(s) and – if applicable – an auxiliary supervisor for extramural doctoral candidates; for doctoral schools graduates this is regulated in the internal regulation of the school (see art. 205(1)(1) of the HESL)
- 2) determination of the fee for proceedings in the extramural mode and the rules for exemption from this fee; doctoral school graduates, who submitted the thesis as a result of the training in the doctoral school, run by the doctorate-awarding entity, where they applied for the doctoral degree, are not charged for the proceedings (see art. 182(4) of the HESL);
- 3) verification of learning outcomes for qualifications at PRK level 8 for extramural doctoral candidates; doctoral schools graduates need not pass the verification, as such verification should be a part of the training in doctoral schools (art. 261(2) of the HESL).

Therefore, considering the legibility of internal regulations for non-lawyers, it should be considered good practice to **locate provisions concerning extramural candidates only in a separate part of the regulation** (i.e., chapter).

## 2. APPOINTMENT AND CHANGE OF A SUPERVISOR(S) AND – IF APPLICABLE – AN AUXILIARY SUPERVISOR FOR EXTRAMURAL DOCTORAL CANDIDATES

The doctoral candidate prepares her/his doctoral dissertation in cooperation with and under the supervision of academic advisors – namely a supervisor(s) and – if applicable – an auxiliary supervisor (art. 190(1) of the HESL).

The law imposes certain requirements on supervisors and auxiliary supervisors (see art. 190(4) – 190(6) of the HESL), while the doctorate-awarding entity may **specify other (additional) requirements in its internal regulations**.<sup>5</sup> These should be highlighted as good practices.

Two solutions, adopted by doctorate-awarding entities, should be distinguished as pro-quality and significantly improving the situation of doctoral candidates. These are:

- 1) **conducting an evaluation (assessment) of the quality of scientific supervision (usually at the same time as the mid-term evaluation, although not necessarily); the negative result of which twice results in disqualification from being a supervisor for a specific period of time (e.g. for 5 years),**
- 2) **prohibition on being a supervisor for more than two doctoral candidates at the same time** (indeed, with more doctoral candidates under supervision it is difficult to provide reliable attention and support to the candidates).

The internal resolutions should specify only the manner of appointment and change of a supervisor(s) and – if applicable – an auxiliary supervisor - only for the doctoral candidates who prepare their dissertation in the extramural mode. Doctoral candidates in doctoral schools have their supervisors and auxiliary supervisors appointed within the first three months of the training in doctoral school (art. 201(2) of the HESL). Detailed rules for such appointment are specified in the doctoral school internal regulations (art. 205(1)(1) of the HESL).

Many of the analysed internal regulations allowed the supervisors or auxiliary supervisors to submit a motion to dismiss her/his from this function without a justifiable reason. This violates art. 183 of the HESL, because an academic teacher or scientific employee cannot refuse to undertake and exercise the role of supervisor or auxiliary supervisor without a due reason.

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<sup>5</sup> M. Dokowicz [in:] *Law on Higher Education and Science. Commentary*, J. Woźnicki (ed.) Warsaw 2019, Art. 192, No. 5, LEX.

Therefore, the regulation that allows the supervisor and auxiliary supervisor to submit a motion **her or his from this function for a genuinely justified reason, such as a serious long-term illness**, should be considered a good practice.

### **3. DETERMINATION OF THE FEE FOR PROCEEDINGS IN THE EXTRAMURAL MODE AND THE RULES FOR EXEMPTION FROM THIS FEE**

As a rule, the doctoral candidate is obliged to pay the fee for the proceedings for awarding of the doctoral degree (art. 182(1) of the HESL).

The fee is not charged in a doctorate-awarding entity when the doctoral candidate is a graduate of the doctoral school run by this entity (including when the school is co-run with another entity) and when the dissertation was prepared in relation to the training which he or she received in the doctoral school (art. 182(4) of the HESL).

The fee cannot exceed the costs of the proceedings, including in particular the costs of the remuneration of the supervisor(s), auxiliary supervisor, and reviewers (art. 182(3) of the HESL). Their remuneration is set in reference to the minimal professor's salary. Supervisor's remuneration is 83%, auxiliary supervisor's – 50% and reviewer's – 27% of the minimal professor's salary. The minimal professor's salary is determined in the regulation of the minister competent for science and higher education.

However, upon analysis of the internal regulations we identified that in some doctorate-awarding entities the remuneration of the supervisors and auxiliary supervisors **is set as a percentage of the actual remuneration of a professor in a given university (higher than the minimum)** and not – as the statute states – the minimum professor's salary. Such provisions directly violate art. 184(2) of the HESL.

Internal regulation should provide rules for:

- 1) determination of the fee, and
- 2) exemption from this fee.

As far as the former is concerned, internal regulation should set the principles of determination of the fee. **Internal regulation may not set a lump sum fee.** The fee, by its very nature, cannot be in a form of a lump

sum, given that the fee may not exceed the costs of the proceeding (art. 182(3) of the HESL) and the costs will differ in each case.

It cannot be accepted when internal regulation delegate the power to establish the rules for determination of the fee to another authority in the doctorate-awarding entity, e.g., to rector. This violates the basic, for administrative law, principle of prohibition of subdelegating of legislative competences. The rules for determination should, therefore, be included only in the internal regulation. Other bodies may only determine the fee for a particular proceeding.

Internal regulations **should not just simply restate the statutory provisions**. They should rather set the actual rules for determining the fee.

Similarly, regarding the 'rules for exemption from this fee', internal regulations should not merely repeat the statutory provisions. Internal regulations usually just repeat art. 182(5) of the HESL, according to which, *in justified cases, the rector, the director of an institute of the Polish Academy of Sciences, the director of a research institute or the director of an international institute may exempt the fee in whole or in part*. It is necessary to **regulate the principles of exemption from this fee in more detail than the HESL does**.

#### **4. SUBMISSION OF THE DISSERTATION**

For internal regulations to comply with the HESL, it must regulate at least to a small extent the mode of submission of the dissertation.

Typically, internal regulations contain provisions indicating **the unit of the doctorate-awarding entity to which the dissertation should be submitted, the number of paper copies of the dissertation or the requirement to submit it electronically (on disc or via an electronic system) in a specific format**. It is also often stipulated in which languages the dissertation may be written.

In the Polish law the regulation is considered to be in accordance with the legal basis for its adoption if it exhaustive in this sense, that contains all the provisions required by the law. Yet, in case of analysed internal regulations, the regulation of dissertation submission process was most often non-exhaustive. This raises a ground for the Council of Scientific Excellence to declare internal regulations invalid in the entirety.



## 5. APPOINTMENT AND THE SCOPE OF TASKS OF THE DEDICATED DOCTORAL COMMITTEE

In universities – by default – the doctorate is awarded by the senate (art. 28(1)(8) of the HESL). The statute of the university may transfer that task onto another body of the university (art. 28(4) of the HESL). In each university the doctorate in one discipline may be awarded by only one body. The same logic applies to awarding the doctorate in the field of science if a university has the right to award the degree in the field, in accordance with art. 185 of the HESL.

In case of doctorate-awarding entities other than universities, namely institutes of the Polish Academy of Sciences, research institutes, and international institutes, the doctoral degree is awarded by the scientific council of the entity (art. 179(1)(2) of the HESL).

The respective bodies, in the doctorate-awarding entities, regardless of its status, may appoint one dedicated doctoral committee (art. 192(1) of the HESL). In internal regulation, the doctorate-awarding entity must specify, among other things, the procedure for the appointment and the tasks of such a committee (art. 192(2)(4) of the HESL).

Internal regulations may, *inter alla*, provide for the obligatory appointment of doctoral committee in each proceeding or reserve this possibility only for these proceedings in which the body conducting the proceedings deems it justified.<sup>6</sup> The committee may be appointed separately for each proceeding or have a permanent character. In the permanent model, many doctoral committees may function in parallel.<sup>7</sup>

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<sup>6</sup> Ł. Kierznowski, *Degrees...*, p. 178.

<sup>7</sup> M. Lekston [in:] *Academic Employment Law. Commentary*, K. W. Baran (ed.), Warsaw 2020, art. 192, No. 2.2.

In both models (*ad hoc* and permanent), **the composition of the committee should reflect the specialization in which the doctoral dissertation is drawn up.** Such policy should be deemed as a good practice of doctorate-awarding entities.<sup>8</sup> Please note, that the members of the committee need not represent the scientific discipline in which the doctoral degree is to be awarded.

However, when it comes to the scope of tasks of the doctoral committee, the freedom of the senate (academic council) is limited by art. 192(1) of the HESL. According to that provision the committee may only *perform activities* in the procedure. Thus, the committee cannot issue acts of application of the law, namely – administrative decisions.<sup>9</sup> As M. Lekston states: "**the appointed committee will perform activities in the basic phase of the doctoral proceedings, but such activities which do not have the dimension of a decision on the awarding of a degree.** This kind of competence is reserved for the bodies listed in art. 178(1) of the HESL".<sup>10</sup>

Thus, internal regulations may only bestow the committee with particular and limited tasks within the proceedings, but which do not result in termination of the proceedings, e.g., refusal to allow for a defence of doctoral dissertation.<sup>11</sup> Most often, doctoral committees are entrusted with conducting the defence of a doctoral dissertation.

## 6. APPOINTMENT OF REVIEWERS

As with supervisors – the doctorate-awarding entities may, but need not, set higher requirements for reviewers. Most often, these relate to the reviewer's knowledge in the subject of the dissertation. Under statutory provisions there is no obligation for the reviewer to be assigned to the same discipline in which the doctoral degree is to be awarded. Therefore, the reviewer can also be a person assigned to another discipline, if he or she has knowledge in the subject of the doctoral dissertation. If that is the case, the reviewer is capable of assessing whether the dissertation presents the candidate's general theoretical knowledge in the discipline or disciplines and the ability to conduct independent scientific or artistic work, and constitutes an original solution to a scientific problem, an original solution to the application of the results of the candidate's own research in the economic or social sphere, or an original artistic achievement. **It is therefore good practice**

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<sup>8</sup> Ł. Kierznowski, *Degrees...*, p. 178

<sup>9</sup> Ł. Kierznowski, *Degrees...*, p. 178

<sup>10</sup> M. Lekston [in:] *Academic Employment...*, art. 192, No. 2.1.

<sup>11</sup> Ł. Kierznowski, *Degrees...*, p. 178

**not to confine candidates for supervisors to those assigned to the same discipline (field) in which the doctoral degree is awarded.**

Among the matters important for the proceedings for the awarding of the doctoral degree, and not mentioned in the HELS, is the issue of the change of reviewers.<sup>12</sup> This is crucial as the reviewers may, for example, succumb to a severe, long-term illness, through which they will not be able to prepare a review. **It is therefore good practice to regulate the rules for changing of reviewers** in the internal regulations.

## **7. VERIFICATION OF LEARNING OUTCOMES FOR QUALIFICATIONS AT PQF LEVEL 8 FOR EXTRAMURAL DOCTORAL CANDIDATES**

Under the HESL, compared to the previously binding statutes, both the graduates of doctoral schools and extramural doctoral candidates are required to obtain learning outcomes for qualifications at PQF level 8 prior to initiation of the proceedings for awarding of the doctoral degree.<sup>13</sup> This is therefore a positive pro-quality change.

Doctoral candidates should obtain learning outcomes at PQF level 8 during their training in doctoral school. Extramural doctoral candidates should, therefore, obtain these outcomes in some other way. The need for their verification thus arises.

The HESL does not specify the mode of verification of obtaining learning outcomes at PQF level 8 in case of extramural doctoral candidates, conferring this issue to the complete regulation in the doctorate-awarding entity internal regulations.

**There are many ways how this verification can be executed.** Verification can be based on submitted documentation, including, e.g., publications of the doctoral candidate. This method is particularly justified in the case of research or teaching assistants. Internal regulations do not need to specify a single method of this verification for all candidates, but can create a more complex mechanism, e.g. one in which the examination is only carried out when it is not possible to carry out the verification on the basis of the submitted documentation.

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<sup>12</sup> Ł. Kierznowski, *Degrees...*, p. 187.

<sup>13</sup> M. Dokowicz [in:] *Law...*, art. 192, No. 8.

Internal regulations should also appoint the body **that will carry out this verification**. It needs not be the body awarding the doctoral degree. As a good practice, it is advisable to **set up a commission for the verification, which is composed of persons specialising in the subject matter that is the subject of scientific activity of the doctoral candidate**.

## **8. VERIFICATION OF THE TRACK RECORD (SCIENTIFIC PUBLICATION) REQUIREMENT IN CASE OF MULTI-AUTHOR PUBLICATIONS**

Pursuant to art. 186(1)(3) of the HESL a doctoral candidate at the time of initiation of the proceedings for the awarding of the doctoral degree must have in her or his scientific/artistic record at least:

- 1) 1 scientific article published in a scientific journal or in the peer-reviewed proceedings of an international conference which, in the year of publication of the article in its final form, was included in the ministry index, or
- 2) 1 scientific monograph published by a publishing house which, in the year of publication of the monograph in its final form, was included in the ministry index, or a chapter in such a monograph, or
- 3) artistic work(s) of significant importance.

As the publications, referred to in points 1 and 2 may be prepared jointly by multiple authors, the HESL requires the doctorate-awarding entities to verify whether the doctoral candidate fulfils the track record requirement. It is crucial to see whether he or she has relevant academic or artistic experience.

Internal regulations should contain provisions for verification of the above-mentioned prerequisite. Typically, doctorate-awarding entities require doctoral candidates to submit either co-authors' statements or only a statement from the doctoral candidate, specifying their input into the joint publication.

## 9. OTHER REQUIREMENTS FOR ADMISSION TO THE DEFENCE AND AWARDING OF THE DOCTORAL DEGREE

Internal regulations may, but need not, specify other conditions that the doctoral candidates must meet to be awarded the doctoral degree. The HESL in art. 191(1) specifies that such conditions should be met prior to the decision on admittance to dissertation defence.

Possibility to confer such additional requirements is an expression of high degree of autonomy institutions of higher education and science in Poland.

Importantly, **these requirements must be "distinct" from those set out by the HESL**, i.e. relate to a different circumstances than those set out by the statute. On the other hand, they may not quantitatively or qualitatively raise particular requirements from those specified by the HESL, e.g., instead of 1 article, require a track record of 2 publications, or instead of knowledge of a modern foreign language at B2 proficiency level – require C1 proficiency level. According to the Council for Scientific Excellence:

*It is not advisable to include in the internal regulations of doctorate-awarding entities requirements specifying the minimum bibliometric requirements for the parametric conditions of the candidates' output, as this is incompatible with the HESL.<sup>14</sup>*

Any additional requirement, on the other hand, may even be an obligation that was previously only customary, such as giving a lecture to the faculty.<sup>15</sup>

## 10. THE OTHER ASPECTS OF THE PROCEEDINGS FOR THE AWARDING OF THE DOCTORAL DEGREE

Based on the wording of art. 192(2) of the HESL one can conclude that the catalogue of issues that should be a subject of internal regulation is non-exhaustive. This means, that the doctorate-awarding entity must include

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<sup>14</sup> Council for Scientific Excellence, Communication No. 11/2020 on oversight activities undertaken by the Council for Scientific Excellence, <https://www.rdn.gov.pl/komunikaty,komunikat-nr-112020-w-sprawie-czynnosci-nadzor-czych-podejmowanych-przez-rade-doskonalosci-naukowej.html> (accessed 25 November 2023).

<sup>15</sup> Ł. Kierznowski, *Degrees...*, p. 192.

in the internal regulations all seven aspects listed in art. 192(2) of the HESL but may also include any other issues that can be deemed as "the manner of proceedings for the awarding of the doctoral degree".<sup>16</sup> These, however, cannot be contrary to the statutes, including the HESL

**It is good practice for internal regulations to include provisions on such other matters:**

- 1) the **detailed course of the defence of the dissertation** - the order of speaking, the stages of the defence, the order of the discussion, the form of defence conclusion, the persons invited to the defence, if any, the persons obliged to take part in the defence,
- 2) the procedure for **changes of reviewers** - more on this in Chapter 6,
- 3) awarding **distinctions** for doctoral dissertations - such a possibility has been left to be decided by doctorate-awarding entities; the HESL mentions distinction of the doctoral dissertation as a precondition for granting the award of the Prime Minister for best doctoral dissertation (art. 364(2) of the HESL); internal regulations should indicate i.e. who can initiate awarding of the distinction for the dissertation (e.g., whether only the reviewer or also a member of the doctoral committee),
- 4) **a specimen of the doctoral diploma** – in the form of an appendix to the regulation; internal regulations should include provisions concerning the issuing of a duplicate diploma<sup>17</sup> or issuing it in foreign languages, both modern and Latin.

In some cases, internal regulations also specify requirements for reviews (the HESL – indirectly – states that they should be concluded with a positive or negative recommendation), including possibility of “conditionally positive” review (which, unlike in the Degrees Act, is not specified by the HESL). If the doctorate-awarding entity considers it appropriate to regulate these issues in its internal regulation, it should follow instructions formed by the Council for Scientific Excellence in [Guidebook. Reviews in scientific promotion proceedings](#).

## **11. PUBLICATION OF INTERNAL REGULATIONS**

The text of internal regulations needs to be published, so its addressees, especially doctoral candidates, may familiarise themselves with it. The doctorate-awarding entity is, by law, obliged to publish the text of the internal regulations in its Public Information Bulletin within 14 days from its adoption (art. 358(2)(4) of the HESL). Breach of this obligation is fined up to PLN 50,000 (art. 431(1)(2)(a) and art. 431(2)(1) of the HESL).

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<sup>16</sup> M. Dokowicz [in:] *Law...*, art. 192, No. 4

<sup>17</sup> Ł. Kierznowski, *Degrees...*, pp. 187-189

It is good practice to **publish the internal regulation not only in the Public Information Bulletin but also on the websites of doctoral schools and the organisational units of doctorate-awarding entities that conduct proceedings for the awarding of the doctoral degree.**

Additionally, we recommend publishing a translation of the internal regulation into English.