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# A GUIDE TO IMMIGRATION AND A NO DEAL BREXIT

DECEMBER 2019

**FRAGOMEN**

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## The London Chamber of Commerce and Industry guide to a no deal Brexit and immigration

### **This guide has been produced to help employers understand, plan for and respond to the immigration and residency challenges posed by a no deal Brexit.**

Throughout the Brexit process, steps have been taken to protect citizens' rights. Ultimately though, Brexit is in part a move to end the UK's involvement in European free movement and there will be an impact on European people in the UK, just as there will be for UK nationals in Europe. Processes will need to be followed and in many cases an application will be needed. Employers and citizens must ensure they understand these rules and take them seriously.

Our guide was originally produced in readiness for an October 2019 Brexit and has been updated following the December 2019 General election. While a no deal Brexit seems unlikely, Brexit is an inherently volatile phenomenon and this guide should prove a useful resource as circumstances dramatically change.

Europeans living in the UK before Brexit will need to make an application under the EU Settlement Scheme. Those moving to the UK before 1 January 2021 will need to apply under a new European Temporary Leave to Remain scheme, and may be limited to staying for just three years. From 2021, the UK will have an entirely new immigration system, quite possibly containing elements of the Australian Points Based System, with additional costs and time considerations before you can employ anybody who is not British or Irish.

UK nationals will lose their free movement rights in the European Union, European Economic Area countries and Switzerland immediately after a no deal Brexit, with the exception of Ireland. That will create logistical challenges for UK nationals already living in those EU countries, where steps will need to be taken to confirm their ability to continue living in that country. The processes required, and the rights granted, will differ from country to country. UK nationals will need to move quickly, as they may have as little as three or six months to register their presence in some countries.

An end to free movement will also carry consequences for UK nationals moving or travelling to Europe after Brexit. Work permits, family visas and other immigration permissions may be needed, under national rules that are not always straight forward for individuals and employers. There will be added cost, complexity and crucially delays to factor in to a move. It will no longer be possible to take a job at the beginning of a month and be over and working in a matter of days or weeks. This is not only about obtaining employment – business travellers who will work in Europe may also need a work permit, even if they are only there for a few days.

There is an awful lot for employers to think about, made more complicated by the fact that even as Brexit day looms, there is still very little policy detail available. Our guide is designed to help you understand the challenges you may need to overcome and start planning. The guide cannot of course be treated as legal advice and things will change as we move beyond Brexit. We would urge you to research the issues thoroughly or seek professional advice before taking any decisions, and have included a number of links to help you on your way.

At the time of writing Brexit has been extended to 31 January 2020. Irrespective, the possibility of a no deal Brexit will remain for some time. The dates and policies may change but the need to be ready will not. We hope this guide is helpful.

We are grateful to the Department for Business, Energy and Industrial Strategy for their support in the creation of this guide.

## Using this guide

**Our guide addresses the immigration impact of a no deal Brexit. The people impacted by a no deal Brexit are likely to be European nationals living in the UK, UK nationals living in Europe, those who intend to move after Brexit and UK nationals who visit Europe for business or work.**

- ▶ Throughout this guide we refer to European and European countries. For these purposes we are referring to EU Member States, EEA Member States and Switzerland. When referring to the EU Member States we explicitly state the EU, or the Member States.
- ▶ However, the UK's relationship with Ireland pre-dates membership of the European Union. Consequentially, UK nationals in Ireland will not need to make an immigration application and nor will Irish nationals in the UK, although there may be circumstances where an application is advisable if the Irish or UK national has non-European family living with them in the UK or Ireland.
- ▶ If a deal is agreed between the UK and EU a transition period should apply until 31 December 2020, during which time UK and European immigration requirements will not change, although it may be necessary for impacted people to make an immigration application (or similar).
- ▶ Our guide assumes that the UK will leave the European Union on 31 January 2020. If Brexit is delayed some dates contained within the guide may also change.
- ▶ Brexit is inherently volatile and the immigration policies planned by the UK and European governments may change. Please be sure to check current law or seek legal advice before taking any decisions or actions. Fragomen collect and collate the latest updates at: <https://www.fragomen.com/sites/brexit/no-deal-alerts>
- ▶ Our guide sets out some of the main considerations for employers and employees. Immigration rules across Europe are very complicated and wider policies should also be researched and taken in to consideration.

## Employers with European employees in the UK

- ▶ **If there is a deal, Europeans living in the UK before 1 January 2021 will need to make an application under the EU Settlement Scheme, as will their non-European family members.**
- ▶ The applications are free, generally online and reasonably straightforward.
- ▶ Broadly speaking, applicants with five years UK residence will be granted settled status – the right to stay permanently.
- ▶ Those with under five years residence will qualify for pre-settled status before moving to settled status later.
- ▶ They will have until the end of June 2021 to apply and should be strongly urged to submit an application – those who do not will to all intents and purposes risk becoming illegal migrants in the UK. Although late applications will be accepted, it is not clear in what circumstances.
- ▶ **If there is no deal the EU Settlement Scheme will continue to apply but with two important differences:**
  - ▶ **It will only be available to Europeans and their non-European family in the UK before Brexit, with limited allowance for family members who arrive later.**
  - ▶ **For these Europeans and their family, the deadline for applying will be the end of December 2020.**
- ▶ The situation will be different for Europeans who move to the UK after a no deal Brexit:
  - ▶ Those who arrive between Brexit and 31 December 2020 will be able to enter and work as they can now.
  - ▶ If they leave before 1 January 2021 they need not take any action.
  - ▶ If they stay in the UK on and beyond 1 January 2021 they will need to apply for European Temporary Leave to Remain (ETLR).
  - ▶ ETLR will be granted for three years and it is likely that only Europeans in skilled jobs will be able to stay for longer, although there will likely be arrangements for family members of UK nationals and people settled here.

### So what can you do?

1. Talk to people – explain their rights and then direct them to make an application. You can find information here <https://www.gov.uk/government/publications/eu-settlement-scheme-employer-toolkit>.
2. Plan further communications around the government's timetable – reminding people to make applications ahead of the deadline is the best place to start.
3. Ensure that the business, future European hires and their managers know that those who come to the UK after a no deal Brexit may be limited to three years stay, if their employment is not considered skilled in Home Office guidance.
4. Ensure that those hired after a no deal Brexit make an application for ETLR, enabling them to stay for three years, or longer if they are in skilled employment.

## Employers with UK employees in Europe

### The legal position

- ▶ UK nationals will lose their European free movement rights immediately after a no deal Brexit. Without a deal there is not an EU-wide transition period, so Member States have created grace periods for UK nationals legally residing on their territory. The grace periods vary across the EU, and the steps that must be taken during that time also vary.

### In most instances:

- ▶ UK nationals living in Europe will need to make an application for status in their home country or otherwise register their status, and the window to make an application could be as short as six months in some Member States. In some countries, to continue living and working there after Brexit, UK nationals will have to prove that they qualify under national rules.
- ▶ UK nationals intending to work in Europe after a no deal Brexit will need to apply for a work permit or other permission, often navigating complex national requirements and typically with a three to six month lead time.
- ▶ UK nationals visiting Europe for business will need to check whether the tasks they perform are allowed as a visitor, or if a work permit is needed (with the associated cost, complexity and lead time). Entry visas will not be required, as long as the UK does not institute visa requirements for EU citizens.

### Risks and recommendations

Cohort	Risk	Recommendation
UK nationals living in Europe before Brexit	<ul style="list-style-type: none"> <li>• Employers may not hold accurate records of their UK employee population in Europe</li> <li>• Individuals will have a limited amount of time to make an application</li> <li>• Employers may need to coordinate a high number of applications with different requirements, processes and application windows across Europe</li> </ul>	<ul style="list-style-type: none"> <li>• Take steps to establish the nationalities of your employees in Europe and in particular to identify UK national workers</li> <li>• Ensure all UK nationals living in Europe have followed the necessary registration requirements in their host country</li> <li>• Monitor policy announcements from Member State authorities, in particular the opening of any Brexit application schemes</li> <li>• Direct UK nationals to make an application as schemes begin to accept applications, where appropriate providing support and prioritising applications</li> </ul>
UK nationals moving after Brexit	<ul style="list-style-type: none"> <li>• Moves may not be possible if salary, skill or other work permit requirements are not met</li> <li>• Moves may be delayed, as processing times in most countries are expected to increase after a no deal Brexit</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that recruiters, line managers and candidates understand that moves may be delayed</li> <li>• Already assess work permit eligibility for any candidates due to move, to understand whether they will qualify for a work permit and in what circumstances</li> <li>• Adjust start dates where necessary</li> </ul>

Cohort	Risk	Recommendation
UK nationals visiting Europe	<ul style="list-style-type: none"> <li>• Activities previously performed while on business travel may require work authorisation after Brexit</li> <li>• Business visitors (and others) who work or intend to work without the correct permission can face immigration, financial or criminal sanctions as can their employers</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure UK national employees who will visit Europe understand that some activities will require authorisation</li> <li>• Map the activities typically undertaken by UK national business visitors against the rules for frequent destination countries, directing alterations in activities or work permit applications where appropriate and possible</li> <li>• Where necessary consider whether visits can be conducted by work eligible employees</li> </ul>

## Our country by country guide

Managing these risks is a complex exercise, not least because of the patchwork of differing immigration requirements and processes across Europe. Our indexed guide will help you navigate those immigration systems, setting out high level requirements for UK nationals already living in Europe and work permit requirements for those who will move after Brexit. We have also provided a short summary of business travel policies for Europe as a whole.

While the guide should not be treated as legal advice – there are more considerations than can fit in a document of this nature, and application of the rules always depends on individual circumstances – we hope it will help you set off in the right direction. Failing to comply with immigration rules around Europe, even unintentionally, can have serious consequences, and employers and individuals should consider whether to seek legal advice.

As Ireland is a little different, we have addressed the situation in a short Frequently Asked Questions format on the following page.



# Ireland

## Frequently Asked Questions

<b>I am a British citizen living in Ireland. In the event of a hard Brexit, will my status in Ireland be impacted?</b>	No. Under the Common Travel Area (CTA) agreement between the UK and Ireland you have the right to continue to live and work in Ireland. This will not be impacted by Brexit.
<b>I am an Irish citizen with a British spouse living in Ireland. In the event of a hard Brexit will his /her status in Ireland be impacted?</b>	No. Under the CTA agreement between the UK and Ireland your British spouse has the right to continue to live and work in Ireland. This will not be impacted by Brexit.
<b>I am an EU/EEA citizen living in Ireland with a British spouse. In the event of a hard Brexit will his / her status in Ireland be impacted?</b>	No. Under the CTA agreement between the UK and Ireland your British spouse has the right to continue to live and work in Ireland. This will not be impacted by Brexit.
<b>I am a British citizen and my spouse is an EU/EEA national. In the event of a hard Brexit will his /her status in Ireland be impacted?</b>	No. Your spouse has the right to continue to live and work in Ireland as an EU/EEA national. This will not be impacted by Brexit.
<b>I am a British citizen and my spouse is a non-EU/EEA citizen. In the event of a hard Brexit will his /her status in Ireland be impacted?</b>	<b>Perhaps:</b> <ul style="list-style-type: none"> <li>• Non-EEA family members who are already in Ireland (with an EU Treaty Rights immigration permission) with the UK principal worker on Exit Day will be allowed to remain and work (on an Irish domestic immigration permission).</li> <li>• However, the Irish government has not yet published guidance regarding those who arrive after Brexit day (in a no-deal Brexit scenario), or those who did not receive a final determination on their application prior to a no-deal Brexit day.</li> </ul>
<b>I am a British citizen. In the event of a hard Brexit what queue do I need to use at the airport when entering Ireland. EU /EEA or others?</b>	You will still be able to use the EU immigration queue, which will be renamed as the EU/ UK queue. However you will need to use the Green customs channel if you are arriving from a UK airport, or the Red channel if you have goods to declare.
<b>I was born in Northern Ireland. Can I claim Irish Citizenship?</b>	Yes, you can. Please check Irish citizenship rules or with an immigration professional for further guidance.
<b>I was born in the UK but my mother / father was born in Ireland. Am I an Irish Citizen?</b>	Yes, you are. Please check Irish citizenship rules or with an immigration professional for further guidance.
<b>I was born in the UK but my grandmother and/or grandfather was born in Ireland. Am I an Irish Citizen?</b>	Not automatically, but you can obtain Irish citizenship. You will need to apply for Foreign Birth Registration (FBR).  This could take up to a year. Once approved then you are an Irish citizen and can apply for an Irish passport. Please contact Fragomen for further guidance.
<b>I live in Northern Ireland and work in the Republic of Ireland. Will I need work permission post Brexit?</b>	Assuming you are a British, Irish or an EEA citizen then nothing will change. However we will need to see what the impact of a hard Brexit will be as this might result in some form of control at the border.
<b>I live in the Republic of Ireland and work in Northern Ireland. Will I need work permission post Brexit?</b>	It depends. If you hold a British or Irish passport then no, nothing will change. However if you hold an EEA passport then you might need work permission in the event of a hard Brexit. The position of the UK government on this point is uncertain at present. Please contact Fragomen for up to date advice.



# Austria

## Rules for UK Nationals Already Living in Austria

<b>What administrative steps must UK national residents take to acquire/retain their status in Austria?</b>	<p>UK nationals and their non-EU family members residing in Austria for a period shorter than five years as of Exit Day, would be able to apply for a Red-White-Red Plus Card without having to demonstrate German language skills and without having to submit proof of accommodation, health insurance or sufficient financial means.</p> <p>UK national residents and their non-EU family members could also apply for another Austrian permit type under the immigration rules for non-EU nationals, although no exemptions to the eligibility criteria have been confirmed for other permit types.</p>
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Six months from Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes. Only UK nationals having European right of residence in Austria on the Exit day would be able to continue working and staying in Austria. The six-month grace period would apply only to UK nationals who stayed in Austria for more than three months at the Exit Day.
<b>Where can I find more information?</b>	<a href="http://www.federal-chancellery.gv.at/brexit">http://www.federal-chancellery.gv.at/brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Austria After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Austria or will there be a free-movement grace period of some kind?</b>	<p>The European Union has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.</p> <p>For “work” activities – which in Austria includes many activities that people generally consider “business” and not work – UK nationals will require a work permit and a work visa, unless one of a handful of rare exceptions applies.</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Austria or will there be a free-movement grace period of some kind?</b>	Yes. While UK nationals would be able to stay in Austria until their visa-free stay period expires, they will be required to apply for a national work and residence permit. Eligibility criteria is expected to be the same as for non-EU applicants. They will not be able to start work activities until after they obtain their permit.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>In general, work authorisation is required for all activities, with very few exemptions for high-level business visits of less than one week. The main categories of work authorisation are the following:</p> <ol style="list-style-type: none"> <li>(1) The Short-Term Work/Secondment Permit for stays of up to four or six months.</li> <li>(2) The EU Blue Card is for highly skilled local hires who meet a high-salary threshold.</li> <li>(3) The Red-White-Red Card is for locally hired key personnel with long-term accommodation.</li> <li>(4) The EU Intracompany Transferree (ICT) Permit is for intracompany transfers of managers, specialists and trainees.</li> </ol> <p>The permit duration and criteria differ between these categories.</p>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 35 days to as long as 125 days.



# Belgium

## Rules for UK Nationals Already Living in Belgium

<b>What administrative steps must UK national residents take to acquire/retain their status in Belgium?</b>	None specified. Presumption is that UK nationals will have to obtain residence/work authorisation under standard rules for non-EU nationals once the transition period ends.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	The transition period applies to UK nationals who already have a residence document issued under EU free movement law. UK nationals who reside in Belgium but do not have a residence document should obtain one before Brexit.
<b>Where can I find more information?</b>	<a href="https://www.belgium.be/en/brexit">https://www.belgium.be/en/brexit</a> , <a href="http://dofi.ibz.be">http://dofi.ibz.be</a> , <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Belgium After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Belgium or will there be a free movement grace period of some kind?</b>	<p>The European Union has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.</p> <p>However, while visa-exempt for business, the presumption is that UK National will be permitted to conduct only “business” activities during short stays and not be permitted to engage in work. UK citizens will be subject to immigration checks upon entry, as non-EU nationals, and will have to follow the appropriate lanes for non-EU nationals.</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Belgium or will there be a free-movement grace period of some kind?</b>	<p>After withdrawal, UK nationals will no longer be able to take advantage of the conditions in force until the moment of withdrawal and will be subject to the general rules applicable to non-EU nationals in the UK. It is expected that short term work (less than three months) will be allowed for visiting UK nationals, but this remains to be set in law.</p> <p>Updated draft legislation published in Belgium states that UK National and their family members working as cross-border workers or interns would be allowed to continue working in Belgium during the grace period in case of a no-deal Brexit, provided that the cross-border work or studies started before Brexit.</p>
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	None (other than for cross-border workers, commuters, posted workers, and similar)
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for foreign nationals travelling to Belgium for work activities that exceed the scope and/or duration of allowable business visits. The primary category of work authorisation is the Single Permit for Highly Skilled Workers and Executives. It can be granted for one to three years, depending on the region of employment (renewable).</p> <p>For Highly Skilled Workers, the main criteria are:</p> <ul style="list-style-type: none"> <li>• The foreign national receives a salary in line with regional salary requirements;</li> <li>• The foreign national has a diploma equivalent to at least a bachelor’s degree, for a higher education programme of at least three years.</li> </ul> <p>For Executives, the main criteria are:</p> <ul style="list-style-type: none"> <li>• The foreign national receives a salary in line with regional salary requirements;</li> <li>• The foreign national has a managerial position, responsible for the day-to-day management of the company, and is authorised to represent the company and enter into legal agreements on the company’s behalf;</li> <li>• The managerial function is verified by an organisational chart;</li> <li>• Note that regional rules vary;</li> <li>• Responsibility for immigration is shared between the federal and regional level, therefore immigration is complex and employers must check the local applicable rules in the region(s) they operate.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 25 days to as long as 142 days.



# Bulgaria

## Rules for UK Nationals Already Living in Bulgaria

<b>What administrative steps must UK national residents take to acquire/retain their status in Bulgaria?</b>	During the transition period UK nationals and their family members must apply for a new residence permit, according to the new specific rules that will be in place on Exit Day. Upon filing the application individuals will receive a temporary certificate valid for one month until the formal procedure is complete.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	For most UK nationals there will be a transitional period that runs through 31 December 2020, but a longer period applies for the following: <ul style="list-style-type: none"> <li>• Non-EU family members of UK nationals who have obtained their residence permit on or before Exit Day who do not already reside in Bulgaria have until 29 March 2022;</li> <li>• UK nationals who are already family members of Bulgarian nationals as of Exit Day have until 29 March 2022</li> </ul> Note that there will not be a transitional period for the children of UK nationals who have obtained their residence permit but who are born between the day after Exit Day and 31 December 2022.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes. UK nationals who already possess a residence document issued under EU free movement law do not need to take any action. The document will be considered a valid ground for residence until the expiry of the grace period or the expiry date of the document, whichever occurs first. However, those who do not possess a residence document at Exit Day will be treated as non-EU nationals and will not be able to benefit from the residence permit process described above.
<b>Where can I find more information?</b>	<a href="http://www.mvr.bg/en/about-the-ministry/brexit/information-about-brexit">www.mvr.bg/en/about-the-ministry/brexit/information-about-brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Bulgaria After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Bulgaria or will there be a free-movement grace period of some kind?</b>	The European Union has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK National will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Bulgaria or will there be a free-movement grace period of some kind?</b>	Yes. UK nationals who do not hold a Bulgarian residence document seeking to enter after Exit Day will be treated as non-EU nationals and will require work authorization to take up employment in Bulgaria.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	None specified.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required to carry out any work or remunerated activities. The primary work authorisation options are: <ul style="list-style-type: none"> <li>• The Combined Work and Residence Permit for locally hired staff with skills not available in the Bulgarian labor market. It can be granted for up to one year initially and can be extended twice in one-year increments, followed by a three month cooling off period;</li> <li>• The EU Transferee (ICT) Permit, for the transfer of managers, specialists and trainees. It can be issued for up to three years initially for managers and specialists, or one year for trainees. Renewals are generally not possible;</li> <li>• The EU Blue Card, for highly skilled, highly educated local hires. It is generally granted for a maximum initial period of four years and can be renewed for additional four-year periods indefinitely.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 10 days to as long as 6 months.



# Croatia

## Rules for UK Nationals Already Living in Croatia

<b>What administrative steps must UK national residents take to acquire/retain their status in Croatia?</b>	During the transitional period, UK nationals will have to apply for a new residence permit which will be issued in the format laid down by Regulation 1030/2002.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Recommended to file within 12 months of Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>Yes.</p> <p>UK nationals and their family members must have already registered their temporary or permanent stay, or have been issued with a residence card document issued under EU free movement law as of the day before Exit Day to benefit from the transition period. Once applicants complete the registration of temporary residence, they will be immediately issued with a Registration Certificate (<i>Potvrda o prijavi privremenog boravka</i>) in a paper form, free of charge.</p> <p>Those who have not registered their residence prior to Exit Day will have to apply for a residence status and residence permit in line with legislation for non-EU nationals.</p>
<b>Where can I find more information?</b>	<p><a href="https://mup.gov.hr/vijesti/information-concerning-the-future-relations-between-the-united-kingdom-and-the-european-union/283273">https://mup.gov.hr/vijesti/information-concerning-the-future-relations-between-the-united-kingdom-and-the-european-union/283273</a></p> <p><a href="https://mup.gov.hr/aliens-281621/stay-and-work/stay-and-work-of-eea-nationals-and-their-family-members/281688">https://mup.gov.hr/aliens-281621/stay-and-work/stay-and-work-of-eea-nationals-and-their-family-members/281688</a></p> <p><a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a></p>

## UK Nationals Seeking to Enter Croatia After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Croatia or will there be a free-movement grace period of some kind?</b>	<p>UK nationals will be non-EU nationals from the first day following Exit Day. The presumption is that UK nationals will be visa exempt for business trips. However, they would likely only be permitted to conduct “business” activities and not engage in “work.”</p> <p>UK nationals will no longer be permitted to use the EU/EEA priority lanes upon entry.</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Croatia or will there be a free-movement grace period of some kind?</b>	UK nationals will be non-EU nationals from the first day following the Exit Day, and thus require work and/or residence authorisation under standard non-EU national procedures.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for all activities outside the allowable scope or duration of a business visit. The primary category of work authorisation is the Stay and Work Permit, which can be granted for local hire as well as a wide range of transfer types, with eligibility criteria depending on the transfer type and duration of stay. Croatia also offers a form of the EU Blue Card.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 7 days to as long as 45 days.



# Cyprus

## Rules for UK Nationals Already Living in Cyprus

<b>What administrative steps must UK national residents take to acquire/retain their status in Cyprus?</b>	UK nationals and their (non-EU) family members residing in Cyprus for a period shorter than five years would be able to apply for a special temporary residence permit allowing them to continue working and residing in Cyprus until they reach five years of residence.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	None. UK nationals already residing in Cyprus would be able to apply for a residence permit.
<b>Where can I find more information?</b>	<a href="http://www.brexit.com.cy">www.brexit.com.cy</a> <a href="http://www.moi.gov.cy/crmd">www.moi.gov.cy/crmd</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Cyprus After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Cyprus or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Cyprus until 31 December 2020 will be able to continue to register in the same way as EU nationals.
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Cyprus or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Cyprus until 31 December 2020 will be able to continue to register in the same way as EU nationals. Only those planning to arrive on 1 January 2021 and after would be required to apply for a local permit under the same requirements and process as non-EU nationals.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	Yes - through 1 January 2021
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for foreign nationals seeking to perform work activities in Cyprus that are not allowed as a business visitor, either because of the duration or the nature of the activities. The primary category of work authorisation is the Combined Permit, suitable for locally hired foreign workers. The permit can be granted for one year or the duration of employment, whichever is shorter.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 8 days to as long as 6 weeks.



# Czech Republic

## Rules for UK Nationals Already Living in Czech Republic

<b>What administrative steps must UK national residents take to acquire/retain their status in Czech Republic?</b>	During the transition period, UK nationals must apply for a residence permit under existing rules for non-EU nationals.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020 for UK nationals who have obtained a certificate of temporary stay prior to Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Czech authorities have urged UK nationals to apply for an EU temporary residence certificate ( <i>Potvrzení k pøechodnému pobytu pro obèany EU/EEA</i> ) –before Exit Day. Those who fail to do so will not be able to continue residing and working in the Czech Republic and would only be able to perform activities allowed for business visitors.
<b>Where can I find more information?</b>	<a href="https://www.mvcr.cz/clanek/brexit.aspx">https://www.mvcr.cz/clanek/brexit.aspx</a> <a href="https://www.brexitinfo.cz/">https://www.brexitinfo.cz/</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Czech Republic After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to the Czech Republic or will there be a free-movement grace period of some kind?</b>	Visa exempt for business trips. Like non-EU nationals currently, UK nationals would only be permitted to conduct “business” activities and not engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Czech Republic or will there be a free-movement grace period of some kind?</b>	UK nationals would be treated as visa-exempt non-EU nationals, so they would not need a visa to enter the Czech Republic but would have to obtain work and residence authorisation.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for foreign nationals seeking to work and stay in the Czech Republic beyond the allowable scope and/or duration of a business visit. The primary category of work authorisation is the Employee Card, suitable for local hires who will occupy a position that requires specialised knowledge and qualifications not readily available in the local workforce. It is generally granted for between 6 months and 2 years. Extensions are available.</p> <p>The main criteria are:</p> <ul style="list-style-type: none"> <li>• The host employer is registered with the Czech Commercial Register;</li> <li>• The host employer posts the vacancy through the Czech Labour Office for 30 days;</li> <li>• The foreign national has specialised high-level knowledge and relevant work experience, not available in the local labour market;</li> <li>• The foreign national receives a salary in line with local salary requirements.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 30 days to as long as 125 days.



# Denmark

## Rules for UK Nationals Already Living in Denmark

<b>What administrative steps must UK national residents take to acquire/retain their status in Denmark?</b>	<p>If a UK national already has a residence document issued under EU free movement law, it will be considered a temporary residence permit until otherwise decided by Danish authorities.</p> <p>Those who do not have a residence document are encouraged by Danish authorities to submit an application for such documentation before Exit Day in order to be able to prove their rights.</p>
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	The transitional measures will apply “temporarily” until a permanent solution is finalised.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	It will be possible to submit an application for an EU residence document after Exit Day, but applicants would be required to submit proof that they obtained a right to reside in Denmark under EU free movement prior to Exit Day.
<b>Where can I find more information?</b>	<a href="https://uim.dk/brexit/brexit-how-does-it-affect-you-as-a-british-citizen-living-in-denmark">https://uim.dk/brexit/brexit-how-does-it-affect-you-as-a-british-citizen-living-in-denmark</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Denmark After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Denmark or will there be a free-movement grace period of some kind?</b>	UK nationals would immediately be considered non-EU nationals, and be visa exempt for business trips. They would only be permitted to conduct “business” activities and not engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Denmark or will there be a free-movement grace period of some kind?</b>	<p>UK nationals would immediately be considered non-EU nationals and require work and residence authorisation.</p> <p>In addition, postings to Denmark (for individuals of any nationality) under the EU rules concerning the provision of ongoing services can continue and be completed as planned. Posting for the provision of services in Denmark that commences after Exit Day will have to be done in accordance with the rules of the Aliens Act.</p>
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	None.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for foreign nationals travelling to Denmark for activities beyond the allowable scope or duration of a business visit, where those activities do not qualify for a work authorisation exemption.</p> <p>The primary category of work authorisation is the Pay Limit Scheme, which is mainly granted to highly skilled workers, and can be issued for up to 4 years.</p>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 10 days to as long as 30 days for new applications and up to 90 for renewal applications.



# Estonia

## Rules for UK Nationals Already Living in Estonia

<b>What administrative steps must UK national residents take to acquire/retain their status in Estonia?</b>	Eligible UK nationals and their family members would automatically be granted a temporary residence permit valid for up to 5 years, or a long-term residence permit if already residing in Estonia as long-term residents. Eligible UK nationals and their family members would be issued residence cards starting 1 April 2020.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Not applicable - UK nationals and family members automatically granted residence permits.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	None.  The transitional arrangements apply to current residents only. UK nationals are urged to complete EU Registration ( <i>Elamisõigus</i> ) and obtain a local identity card, if not yet completed, to prove their right of residence after Brexit.
<b>Where can I find more information?</b>	<a href="https://www2.politsei.ee/en/teenused/residence-permit/pikaajalise-elaniku-elamisluba/">https://www2.politsei.ee/en/teenused/residence-permit/pikaajalise-elaniku-elamisluba/</a> <a href="https://vm.ee/en/what-do-you-need-know-regard-brexit">https://vm.ee/en/what-do-you-need-know-regard-brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Estonia After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Estonia or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Estonia after Exit Day will be treated as non-EU nationals.
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Estonia or will there be a free-movement grace period of some kind?</b>	UK nationals and their family members arriving after Exit Day, would immediately be required to obtain a residence permit. UK nationals and their family members will not, however, be subject to the Estonian annual immigration quota.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for foreign nationals seeking to work in Estonia beyond the allowable scope or duration of a business visit. The main work authorization categories are the Short-Term Employment Program, suitable for work activities up to 12 months based on prior registration; and the Residence Permit for Employment, suitable for foreign workers with skills not locally available, and granted for up to 2 years at a time.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 10 days to as long as 60 days.



# Finland

## Rules for UK Nationals Already Living in Finland

<b>What administrative steps must UK national residents take to acquire/retain their status in Finland?</b>	Not specified, but presumption is that they would need to apply for immigration status as non-EU nationals once the transition period ends.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>Yes. To be covered by the transition period, UK nationals must register their right of residence, by visiting the Finnish Immigration Service in person.</p> <p>Unregistered UK citizens will become non-EU nationals on Exit Day and will not have the right to reside in the country. Stay would then be on the basis of visa-free time allowed in the Schengen area, so UK nationals could only reside legally in the country for a further 90 days.</p>
<b>Where can I find more information?</b>	<a href="http://www.vnk.fi/en/information-about-brexit">http://www.vnk.fi/en/information-about-brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Finland After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Finland or will there be a free-movement grace period of some kind?</b>	<p>UK nationals will be non-EU nationals from the first day following Brexit.</p> <p>The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work,” unless a work authorisation exemption for non-EU nationals applies.</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Finland or will there be a free-movement grace period of some kind?</b>	UK nationals will be non-EU nationals from the first day following Brexit and thus require work and/or residence authorisation under standard non-EU national procedures.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for foreign nationals seeking to conduct activities in Finland beyond the allowable scope or duration of a business visit. Note that foreign nationals who will receive any monetary compensation from a Finnish entity require work authorisation, regardless of activities performed or duration of stay.</p> <p>The primary category of work authorisation is the Residence Permit for a Specialist. It can be granted for up to two years. The main criteria are that the foreign national has a higher education degree and that the host position requires a high level of qualifications or skills.</p>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 30 days to as long as 180 days.



# France

## Rules for UK Nationals Already Living in France

<p><b>What administrative steps must UK national residents take to acquire/retain their status in France?</b></p>	<p>UK nationals and their family members residing in France for less than 5 years, will need to obtain a French residence card after Brexit.</p> <ul style="list-style-type: none"> <li>• General document list: These UK nationals will need to submit a passport; passport photographs; their current residence permit (if applicable) or alternatively proof of residence for five years; among other specific documents;</li> <li>• Documents for workers: UK national workers eligible for a French residence card must submit their employment contract and salary slips over the past three months to obtain an employee (<i>salarie</i>) or temporary worker (<i>travailleur temporaire</i>) card;</li> <li>• UK nationals can now apply for a residence card online at <a href="https://contacts-demarches.interieur.gouv.fr/brexit/brexit-demande-titre-sejour/">https://contacts-demarches.interieur.gouv.fr/brexit/brexit-demande-titre-sejour/</a>.</li> </ul>
<p><b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b></p>	<p>The grace period will last for twelve months from Exit Day. However, UK nationals and their family members wishing to stay in France for more than twelve months after Exit Day must apply for a French residence card within six months from Exit Day.</p>
<p><b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b></p>	<p>None - UK nationals residing in France would need to apply for a residence permit during the transition period.</p>
<p><b>Where can I find more information?</b></p>	<p><a href="https://brexit.gouv.fr/sites/brexit/accueil.html">https://brexit.gouv.fr/sites/brexit/accueil.html</a>  <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>  <a href="https://brexit.gouv.fr/sites/brexit/accueil/vous-etes-britannique-en.html">https://brexit.gouv.fr/sites/brexit/accueil/vous-etes-britannique-en.html</a></p>

## UK Nationals Seeking to Enter France After Brexit

<p><b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to France or will there be a free-movement grace period of some kind?</b></p>	<p>To date, the French government has yet to specify whether UK nationals will be treated as non-EU nationals immediately after Exit Day, however the EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. Note that, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work”.</p>
<p><b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in France or will there be a free-movement grace period of some kind?</b></p>	<p>Because the French government has yet to specify when UK nationals will be treated as non-EU nationals, the current expectation is that UK nationals arriving in France after Exit Day will be required to obtain work and residence authorisation under the same eligibility criteria as non-EU nationals.</p>
<p><b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b></p>	<p>None.</p>
<p><b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b></p>	<p>Work authorisation is required for all non-EU nationals who will perform activities beyond the scope and/or duration of a business visit.</p> <p>France’s immigration and labour laws establish several employment authorization schemes depending on the contract location, transfer arrangements, foreign national skill and salary.</p>
<p><b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b></p>	<p>Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as a few weeks to several months.</p>



# Germany

## Rules for UK Nationals Already Living in Germany

<b>What administrative steps must UK national residents take to acquire/retain their status in Germany?</b>	Under draft plans that have yet to be ratified by the German Parliament, UK nationals currently residing in Germany would be able to continue to stay and work in Germany during the grace period and are expected to apply for a work and residence permit. For 14 months after Exit Day, UK nationals already residing in Germany and new arrivals will be able to apply for work and residence permits under rules that are different than other non-EU nationals. UK nationals would be eligible for a work permit category with more favourable treatment, when compared to other non-EU nationalities.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Currently three months from Exit Day, but possibly extended to nine months.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	UK nationals should have their current residential address registered with the local town hall in Germany. UK nationals who have already received a formal letter from their immigration office are advised to follow the instructions in the letter. UK nationals should contact their local immigration offices to see if they are able to register or apply for their proper immigration status prior to Exit Day.
<b>Where can I find more information?</b>	<a href="https://www.auswaertiges-amt.de/en/aussenpolitik/europa/Brexit">https://www.auswaertiges-amt.de/en/aussenpolitik/europa/Brexit</a> ; <a href="https://www.bmi.bund.de/SharedDocs/faqs/EN/themen/migration/brexit/faqs-brexit.html">https://www.bmi.bund.de/SharedDocs/faqs/EN/themen/migration/brexit/faqs-brexit.html</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Germany After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Germany or will there be a free-movement grace period of some kind?</b>	UK nationals will continue to be work and residence permit exempt for the three months following Exit Day.  After that three-month period, the EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Germany or will there be a free-movement grace period of some kind?</b>	UK nationals will continue to be work and residence permit exempt for the three months following Exit Day. After this three-month period, however, UK nationals who enter Germany or who seek to stay in Germany beyond the three-month grace period will need to obtain a work and/or residence permit. Applications for work and residence permits will have to be filed within the grace period.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	Yes. UK nationals will continue to be work and residence permit exempt for three months following Exit Day.  For 14 months after Exit Day, new UK national arrivals would be able to apply for work and residence permits without having to meet standard non-EU national qualifications. For an additional 12 months following this 14-month period, UK nationals would still be eligible for a new work permit category that will have more favourable treatment than non-EU nationals.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is appropriate for all non-EU citizens who will work in Germany. The main work authorisation categories are the EU ICT Permit (locally called ICT Card) – suitable for highly skilled managers, specialists and trainees on assignment within a company group and typically granted for up to three years; the Local Hire Work & Residence Permit – suitable for skilled employees on a German contract and paid via German payroll and granted for up to one year; and the EU Blue Card – suitable for highly skilled employees who meet a minimum salary requirement, sign a German contract and are paid via German payroll, typically granted for up to four years. German employers that wish to sponsor work and residence permits must be registered with the labor authorities and must have a corporate registration number.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 36 days to as long as 89 days.



# Greece

## Rules for UK Nationals Already Living in Greece

<b>What administrative steps must UK national residents take to acquire/retain their status in Greece?</b>	If UK nationals already have a residence document issued under EU free movement law, this will be considered as a temporary residence permit until 31 December 2020. During the transitional period, the holder must apply for a new residence document, according to the applicable immigration rules for residence of non-EU nationals and new specific rules that are in place.
<b>How long will they have to complete this process – in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes.  UK nationals permanently must be in possession of a registration certificate ( <i>βεβαίωση εγγραφής</i> ) or a temporary or permanent residence document ( <i>πιστοποιητικό έγγραφο άδειας διαμονής</i> ) before Exit Day to take advantage of the transition period.
<b>Where can I find more information?</b>	<a href="http://immigration.gov.gr/web/guest/adeia-diamonis-makras-diarkeias">http://immigration.gov.gr/web/guest/adeia-diamonis-makras-diarkeias</a> <a href="https://brexit.gov.gr/uk-citizens-in-greece/">https://brexit.gov.gr/uk-citizens-in-greece/</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Greece After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Greece or will there be a free-movement grace period of some kind?</b>	The Greek government states that UK nationals and their family members arriving in Greece before 31 December 2020 will still be treated as EU nationals.
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Greece or will there be a free-movement grace period of some kind?</b>	The Greek government states that UK nationals and their family members arriving in Greece before 31 December 2020 will still be treated as EU nationals. In parallel, UK nationals and their family members shall prepare to apply for a residence permit as non-EU by 31 December 2020.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	Yes - through 31 December 2020.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required to reside and work legally in Greece. The primary category of work authorisation is the Work/Residence Permit for Senior-Level Employees. It can be granted for up to two years. The main criteria are: <ul style="list-style-type: none"> <li>• The employer is a commercial company, either Greek or a subsidiary or branch of a foreign company; and</li> <li>• The foreign national is a senior manager, shareholder, member of the Board of Directors, or legal representative.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 10 days to as short as ten days to as long as 60 days from the submission of a complete file.



# Hungary

## Rules for UK Nationals Already Living in Hungary

<b>What administrative steps must UK national residents take to acquire/retain their status in Hungary?</b>	UK nationals would be able to apply for a National Settlement Permit (the national permanent residence permit) under facilitated eligibility criteria; or for an EU Settlement Permit (the permanent residence permit based on EU law) under similar eligibility criteria as non-EU nationals.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Three years from Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes.  The transition period applies for UK nationals holding a valid registration certificate ( <i>Regisztrációs igazolás</i> ) or permanent residence card in Hungary on Exit Day.
<b>Where can I find more information?</b>	<a href="https://eu.kormany.hu/en/brexit">https://eu.kormany.hu/en/brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Hungary After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Hungary or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.  However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Hungary or will there be a free-movement grace period of some kind?</b>	New arrivals and individuals currently staying in Hungary without having completed the appropriate registration or permit applications will be required to obtain a Single Permit, the main work authorisation type) under similar eligibility criteria as for non-EU nationals will be required to obtain a Single Permit (the main national work authorisation type).
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for all activities that fall outside the scope or allowable duration of business visits.  The main work authorisation category is the Single Permit. It is available for various types of long-term work activities in Hungary. It can be issued for up to 2 years, or the duration of the assignment / employment, whichever is shorter. Extensions are available. For intracompany transfers, maximum stay is limited to 3 years.  The main criteria are: <ul style="list-style-type: none"> <li>• For intracompany transfers / secondments, an assignment letter is in place between the home employer, local sponsor and foreign national;</li> <li>• For local hires, the host employer and foreign national sign a pro forma draft local employment contract; and conclude the actual employment contract once the single permit is issued.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 15 days to as long as 127 days.



# Italy

## Rules for UK Nationals Already Living in Italy

<b>What administrative steps must UK national residents take to acquire/retain their status in Italy?</b>	UK nationals residing in Italy for a period shorter than five years on Exit Day would be able to apply for a residence permit 'for residence purposes'. After this period, permit holders would need to qualify for a standard national permit type under the same requirements as non-EU nationals. UK nationals residing in Italy for 5 years on Exit Day would be able to apply for the EU permit for long term residents (permanent residency)
<b>How long will they have to complete this process - in other words, how long is the "transitional" or "grace" period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes. Only those UK nationals who are registered residents would benefit from the grace period. The Italian government has strongly encouraged UK nationals living and working in Italy to register at the Register Office of their Italian municipality of residence before Exit Day.
<b>Where can I find more information?</b>	<a href="https://www.esteri.it/mae/en/politica_estera/politica_europea/dossier/brexit.html">https://www.esteri.it/mae/en/politica_estera/politica_europea/dossier/brexit.html</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Italy After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Italy or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only "business" activities during short stays and not be permitted to engage in "work."
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Italy or will there be a free-movement grace period of some kind?</b>	It is not yet clear whether UK nationals arriving on or after Exit Day would similarly benefit from favourable eligibility requirements for national permits.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	To be determined.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	The most common types of work authorisation used by employers in Italy are: <ul style="list-style-type: none"> <li>• EU ICT Work Permit, for managers, specialists or trainees temporary seconded from their home employer outside the EU/EEA to an Italian affiliate;</li> <li>• ICT Work Permit and Permit of Stay, for highly skilled foreign workers assigned to an Italian affiliate of their home employer, who do not qualify for an EU ICT permit; and</li> <li>• EU Blue Card, for highly skilled local hires.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 37 days to as long as 201 days.



# Latvia

## Rules for UK Nationals Already Living in Latvia

<b>What administrative steps must UK national residents take to acquire/retain their status in Latvia?</b>	UK nationals and their family members must apply for a residence permit at the Office of Citizenship and Migration Affairs (OCMA) before 31 December 2020 to maintain status in Latvia. After Exit Day, the government will send UK nationals with a valid Latvian residence document a letter explaining the procedure for obtaining their new residence document.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes.  UK nationals and their family members who do not have a document issued in Latvia confirming their right to reside must personally submit the application, attaching documents that prove their employment, study or self-employment activities in Latvia for at least six months.
<b>Where can I find more information?</b>	<a href="https://www.mfa.gov.lv/en/policy/european-union/brexit">https://www.mfa.gov.lv/en/policy/european-union/brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Latvia After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Latvia or will there be a free-movement grace period of some kind?</b>	UK nationals would be treated as visa-exempt non-EU nationals, so they would not need a visa to enter Latvia, but would have to obtain work and residence authorisation. The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in work.
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Latvia or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Latvia after Exit day will immediately be required to obtain work and residence authorisation under the same eligibility criteria as non-EU nationals.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for all activities over 14 days within a 180-day period that exceed the scope of business visits. The primary category of work authorisation is the Residence Permit with Work Authorisation, available to both intracompany transferees and locally hired foreign nationals. It can be granted for up to five years and is renewable. The main criteria are: <ul style="list-style-type: none"> <li>• The foreign national must receive a salary in conformity with the MSL;</li> <li>• For intracompany transferees: the home and host company have a service agreement in place; and</li> <li>• For locally hired employees: the host employer has completed a labour market test.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 9 days to as long as 58 days.



# Lithuania

## Rules for UK Nationals Already Living in Lithuania

<b>What administrative steps must UK national residents take to acquire/retain their status in Lithuania?</b>	During the transition period, UK nationals residing in Lithuania would be required to apply for a temporary residence permit, with favourable conditions for UK nationals.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Nine months from Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	UK nationals who already have a residence document issued under EU free movement laws need not take any action to take advantage of the nine-month grace period, but they must apply for the new residence permit during the this time.
<b>Where can I find more information?</b>	<a href="https://www.migracija.lt/brexit">https://www.migracija.lt/brexit</a>

## UK Nationals Seeking to Enter Lithuania After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Lithuania or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Lithuania or will there be a free-movement grace period of some kind?</b>	After Exit Day, UK nationals will remain exempt from the obligation to acquire a work permit before taking up employment. However, they will be required to obtain a temporary residence permit if they are staying in Lithuania for more than 90 days within a 180-day period.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	There will be a nine-month transitional period.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	After Exit Day, UK nationals will remain exempt from the obligation to acquire a work permit before taking up employment. However, they will be required to obtain a temporary residence permit if they are staying in Lithuania for more than 90 days within a 180-day period.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	According to the Lithuanian Migration Department obtaining a temporary residence permit takes up to 3 months.



# Luxembourg

## Rules for UK Nationals Already Living in Luxembourg

<b>What administrative steps must UK national residents take to acquire/retain their status in Luxembourg?</b>	UK nationals must apply for a non-EU national residence permit at the latest 3 months before the end of the twelve-month grace period. Applicants are exempt from the declaration of arrival, medical testing, and the need to apply for a residence permit card after the preliminary residence permit application (which are typically required for non-EU nationals).
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Twelve months from Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	To take advantage of the grace period, UK nationals and their family members must have residence documents issued under EU free movement law. This will serve as a temporary residence permit. If a UK national does not already have EU residence documents, they must apply for them before a yet-to-be-determined deadline.
<b>Where can I find more information?</b>	<a href="https://gouvernement.lu/en/dossiers/2019/brexit.html">https://gouvernement.lu/en/dossiers/2019/brexit.html</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Luxembourg After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Luxembourg or will there be a free-movement grace period of some kind?</b>	<p>The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.</p> <p>Like non-EU nationals currently, UK nationals would only be permitted to conduct “business” activities and not engage in “work.”</p> <p>It is likely that they would fall under the work permit exemption if they come for less than three months to perform work at an entity of the same group or to work at a client site</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Luxembourg or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Luxembourg after Exit Day will immediately be required to obtain work and residence authorisation under the same eligibility criteria as non-EU nationals.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No. UK nationals arriving after Exit Day would immediately be required to apply for a work and residence authorisation.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for non-EU/EEA/Swiss nationals who will perform activities beyond the scope or duration permitted for business visitors. The primary categories of work authorisation are the EU Intracompany Transferee (ICT) Permit, the Work Permit for Salaried Workers and the EU Blue Card.</p> <p>The main criteria for the EU ICT Permit are:</p> <ul style="list-style-type: none"> <li>• The sending and host companies are part of the same corporate group (common parent ownership);</li> <li>• The foreign national has been employed by the home employer for three months, and continues to be on indefinite home contract and home payroll;</li> <li>• The foreign national holds a degree/qualification and/or relevant skills and experience;</li> <li>• The foreign national receives a salary similar to a local employee in the same position.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 45 days to as long as 105 days.



# Malta

## Rules for UK Nationals Already Living in Malta

<b>What administrative steps must UK national residents take to acquire/retain their status in Malta?</b>	During the transition period, UK nationals residing in Malta would be required to apply for a new residence permit. If a UK national already has a residence document issued under EU free movement law, it will continue to be valid until a new document is issued reflecting their new immigration status.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	The Maltese government has not specified when the grace period will end.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>Not specified. UK national residents would be eligible for a special ten-year residence permit – a longer validity than any current national permit type – which would be waived from government filing fees. The plans thus far do not mention a grace period during which UK nationals would have to apply for this permit.</p> <p>UK nationals currently residing in Malta are also advised to apply for an e-residence card, if possible, to maximise their rights after Brexit.</p>
<b>Where can I find more information?</b>	<a href="http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&amp;itemid=12976&amp;l=1">http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&amp;itemid=12976&amp;l=1</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a> <a href="https://www.gov.mt/en/pages/FACTSHEET-Malta-Government-plans-in-case-of-a-no-deal-Brexit.aspx">https://www.gov.mt/en/pages/FACTSHEET-Malta-Government-plans-in-case-of-a-no-deal-Brexit.aspx</a>

## UK Nationals Seeking to Enter Malta After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Malta or will there be a free-movement grace period of some kind?</b>	<p>The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries.</p> <p>However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Malta or will there be a free-movement grace period of some kind?</b>	The Maltese government has not specified whether it will treat UK nationals as non-EU nationals after Exit Day. However, it has explained that UK nationals entering Malta after Exit Day would be eligible to apply for a special ten-year residence permit.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	To be determined.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for non-EU nationals seeking to work and stay in Malta beyond the allowable scope or duration of a business visit. The main work authorisation type is the Single Permit, which is required for non-EU nationals to reside and work in Malta. The permit is generally granted for one year and can be renewed.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 8 days to as long as 135 days.



# Netherlands

## Rules for UK Nationals Already Living in The Netherlands

<b>What administrative steps must UK national residents take to acquire/retain their status in The Netherlands?</b>	<p>UK nationals residing in the Netherlands for a period shorter than five years would be able to apply for a temporary residence permit under the same rules that currently apply to them as EU nationals. Special note for cross-border workers: They can still perform cross-border work if they meet the following requirements:</p> <ul style="list-style-type: none"> <li>• The cross-border worker must collect a passport sticker at an IND office by appointment. Affected UK nationals are advised to schedule an appointment to collect a passport sticker as soon as appointments are made available by the authorities. Please note that at present it is not yet possible to schedule an appointment for this sticker;</li> <li>• On the date of Brexit they were a cross-border worker in the Netherlands;</li> <li>• They wish to continue to work as a cross-border worker in the Netherlands after Brexit;</li> <li>• They have a valid employment contract establishing that you will continue to carry out their activities;</li> <li>• Their main place of residence is the UK and they travel back to the UK on average once a week; and</li> <li>• They have a valid UK passport.</li> </ul>
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	15 Months from Exit Day
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>Yes.</p> <p>The Dutch Immigration Authority (IND) is issuing temporary work and residence permits in the form of paper letters to UK nationals registered with Dutch town hall. The permit letters will be valid during the grace period. UK nationals should register a non-temporary personal address with town hall, if not yet completed. Employers should add a copy of the permit letter to their UK national employees’ personnel files once available.</p>
<b>Where can I find more information?</b>	<a href="https://ind.nl/Brexit">https://ind.nl/Brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter The Netherlands After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to The Netherlands or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Netherlands or will there be a free-movement grace period of some kind?</b>	UK nationals not already living in the Netherlands will fall into the standard Dutch immigration rules for non-EU citizens. Under these rules, residence permits are required for stay longer than 90 days and work permits typically are required to carry out work activities. See special note for cross-border workers above.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	None (other than for cross-border workers).
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, how could UK nationals work in the Netherlands after Brexit?</b>	<p>Work authorisation is required for non-EU/EEA/Swiss nationals who will perform activities beyond the allowable scope or duration of business visits. The primary categories of work authorisation are the EU ICT permit, for intracompany assignments, and the Highly Skilled Migrant (HSM) scheme for local hires. A sponsorship licence is required to sponsor HSM applications, and while not required for the EU ICT permit, will confer fast track application times and reduced document requirements. The primary requirement for EU ICT and HSM is meeting the minimum salary threshold set each year. Next to this, the EU ICT permit also requires that the applicant is of the manager, specialist or trainee level, and that sufficient degree or work experience requirements are met. Legal processing times for licensed sponsors are typically 2-4 weeks, and UK nationals will not require an entry visa. The EU ICT permit has the additional benefit that assignees can perform work in other EU countries after additional notification or application steps are complete.</p>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 21 days to as long as 133 days.



# Poland

## Rules for UK Nationals Already Living in Poland

<b>What administrative steps must UK national residents take to acquire/retain their status in Poland?</b>	UK nationals residing in Poland for a period shorter than five years as of Exit Day would be able to apply for a special five-year temporary residence permit. After this period, permit holders would need to qualify for a standard national permit type under the same eligibility criteria as non-EU nationals.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	None anticipated. UK nationals will be free to remain in Poland from the Exit Day until 31 December 2020, provided the UK national enjoyed the right of residence or the right of permanent residence in Poland before Exit Day. However, obtaining the EU residence registration document prior Exit Day will simplify the residence permit procedure.
<b>Where can I find more information?</b>	<a href="https://udsc.gov.pl/en/cudzoziemcy/brexit/">https://udsc.gov.pl/en/cudzoziemcy/brexit/</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Poland After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Poland or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Poland or will there be a free-movement grace period of some kind?</b>	UK nationals would be treated as visa-exempt non-EU nationals, so they would not need a visa to enter Poland but would have to obtain work and residence authorisation.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No. UK nationals arriving in Poland after Exit Day would “most likely” be treated as any other non-EU nationals.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for foreign workers travelling to Poland to perform remunerated activities related to their employment. Even if the activities are limited in nature (e.g. meeting clients, analysing the market), these are considered work if not performed on the foreign national’s own account but as an employee.</p> <p>The primary category of work authorisation is the Work Permit and Single Permit for Local Hire. It can be granted for up to three years.</p> <p>The main criteria are:</p> <ul style="list-style-type: none"> <li>• The host employer posts the vacancy and completes labour market testing (some exemptions apply, e.g. IT positions);</li> <li>• The host employer concludes a local employment contract with the foreign national; and</li> <li>• The foreign national receives a at least the minimum statutory salary (in 2019 - PLN 2,250 gross per month, in 2020 - PLN 2,600 gross per month), and the salary meets the average for the position of the local market.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 51 days to as long as 460 days.



# Portugal

## Rules for UK Nationals Already Living in Portugal

<b>What administrative steps must UK national residents take to acquire/retain their status in Portugal?</b>	UK nationals residing in Portugal for a period shorter than 5 years as of Exit Day would be able to apply for a special national permit type. Further details on this permit type have yet to be published.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	Yes. The beneficial regime would only apply to UK nationals who applied for or obtained an EU Registration Certificate from their local town hall of residence, a mandatory step for EU nationals staying in Portugal for more than 90 days. Applicants must submit proof of address, birth and/or marriage certificates. An alternative solution for UK residents without such a Certificate has not yet been confirmed.
<b>Where can I find more information?</b>	<a href="https://www.portaldiplomatico.mne.gov.pt/politica-externa/brexit">https://www.portaldiplomatico.mne.gov.pt/politica-externa/brexit</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Portugal After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Portugal or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Portugal or will there be a free-movement grace period of some kind?</b>	UK nationals arriving in Portugal after Exit Day will immediately be required to obtain work and residence authorisation under the same eligibility criteria as non-EU nationals.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for all work activities that exceed the scope and duration of a business visit, visit, including any hands-on work at a company location or client site.  The primary categories of work authorisation are the Temporary Stay visa, suitable for short-term work activities; and the Residence Visa, suitable for long term work activities and available for highly qualified staff and for regular local hires.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 40 days to as long as 195 days.



# Romania

## Rules for UK Nationals Already Living in Romania

<b>What administrative steps must UK national residents take to acquire/retain their status in Romania?</b>	UK nationals who have already registered their stay in Romania would be able to request an extension of their temporary residence permit during the grace period. The temporary permit can be valid for up to 5 years. After 5 years of continuous residence in Romania, UK nationals and their family members will be eligible for a long-term residence right.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	No, provided they have already registered as EU residents before Exit Day. Those who have not registered would be required to do so within 90 days of Exit Day in order to be able to obtain or extend their temporary residence permits, as discussed above.
<b>Where can I find more information?</b>	<a href="http://igi.mai.gov.ro/ro/content/brexit-no-deal">http://igi.mai.gov.ro/ro/content/brexit-no-deal</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Romania After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Romania or will there be a free-movement grace period of some kind?</b>	Per the Romanian Immigration Directorate, “British citizens arriving in Romania after the date of the withdrawal of Great Britain from the EU will be subject to the provisions of the national legislation in force regarding the regime of non-EU nationals.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Romania or will there be a free-movement grace period of some kind?</b>	Per the Romanian Immigration Directorate, British citizens arriving in Romania after the date of the withdrawal of Great Britain from the EU will be subject to the provisions of the national legislation in force regarding the regime of non-EU nationals.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for all activities exceeding the allowable scope or duration of business visits. The primary categories of work authorisation are the EU Intracompany Transferee (ICT) Permit and the Work Permit for Local Hires.</p> <p>The EU Intracompany Transferee (ICT) Permit can be granted for up to three years. The main criteria are:</p> <ul style="list-style-type: none"> <li>• The home employer and host sponsor are part of the same corporate group;</li> <li>• The foreign national meets education, qualification and professional experience requirements; and</li> <li>• The foreign national receives a salary in line with minimum salary requirements.</li> </ul> <p>The Work Permit for Local Hires can be granted for up to one year, and can be renewed if eligibility criteria continue to be met. The main criteria are:</p> <ul style="list-style-type: none"> <li>• The foreign national receives a salary in line with minimum salary requirements;</li> <li>• The host employer completes labour market testing; and</li> <li>• The host employer concludes an employment contract with the foreign national.</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 30 days to as long as 45 days.



# Slovakia

## Rules for UK Nationals Already Living in Slovakia

<p><b>What administrative steps must UK national residents take to acquire/retain their status in Slovakia?</b></p>	<p>UK nationals and family members who have resided in the Slovak Republic for less than 5 years will automatically obtain a residence permit valid for 5 years, provided they have completed residence registration.</p> <p>They do not have to apply for this type of residence permit, however they will be required to exchange their “Residency Card of EU National” for a “Residency Card” before 31 December 2020.</p>
<p><b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b></p>	<p>Through 31 December 2020.</p>
<p><b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b></p>	<p>UK national residents and their non-EU family members can continue to stay and work in Slovakia. UK nationals should complete residence registration with the Slovak Foreign Police and hold a valid Slovak Residence Card (Pobytovy preukaz občana EU). The residence card will serve as proof of legal residence in Slovakia prior to Exit Day. Local employees or seconded assignees who are not registered yet but plan to stay in Slovakia after Exit Day should register their residence as soon as possible.</p> <p>UK nationals who have not registered their residence will be considered as non-EU nationals after Brexit.</p>
<p><b>Where can I find more information?</b></p>	<p><a href="https://www.minv.sk/?foreign-police">https://www.minv.sk/?foreign-police</a>  <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a></p>

## UK Nationals Seeking to Enter Slovakia After Brexit

<p><b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Slovakia or will there be a free-movement grace period of some kind?</b></p>	<p>UK nationals will be non-EU nationals from the first day following Brexit. The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”</p>
<p><b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Slovakia or will there be a free-movement grace period of some kind?</b></p>	<p>UK nationals will be non-EU nationals from the first day following Brexit, and thus require work and/or residence authorisation under standard non-EU national procedures.</p>
<p><b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b></p>	<p>No.</p>
<p><b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b></p>	<p>Work authorisation is required for foreign nationals seeking to travel to Slovakia to perform work activities. The primary category of work authorisation is the EU ICT Permit, suitable for intracompany transfers of managers, specialists and trainees. It can be issued for up to three years for managers and specialists, or one year for trainees.</p>
<p><b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b></p>	<p>Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 45 days to as long as 251 days.</p>



# Slovenia

## Rules for UK Nationals Already Living in Slovenia

<b>What administrative steps must UK national residents take to acquire/retain their status in Slovenia?</b>	<p>During a 12-month transition period following Exit Day, UK nationals residing in Slovenia would be able to exchange their existing Residence Certificates for EU Citizens for the corresponding non-EU national residence permits. Those with Certificates of Registration of Permanent Residence would exchange for permanent residence permits and those with Certificates of Registration for Temporary Residence would exchange for temporary residence permits.</p> <p>UK nationals will also be able to apply for temporary residence permits as non-EU nationals before their existing residence permits expire.</p> <p>UK nationals who fail to exchange their existing certificates for a new permit or have not otherwise obtained a residence permit during the transition period will be treated as non-EU citizens after the transition period ends.</p>
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	12 months from Exit Day
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>UK nationals and their family members must have a valid certificate of registration of residence or residence permit in Slovenia prior to Exit Day to benefit from the transition period.</p> <p>UK nationals who do not have a registration certificate or permit on Exit Day and have been present in Slovenia for fewer than 90 days within the previous 180 days will have the opportunity to apply for residence status for a maximum period of one year.</p>
<b>Where can I find more information?</b>	<a href="http://www.vlada.si/en/projects/the_united_kingdoms_decision_to_leave_the_eu_brexit/">http://www.vlada.si/en/projects/the_united_kingdoms_decision_to_leave_the_eu_brexit/</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Slovenia After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Slovenia or will there be a free-movement grace period of some kind?</b>	<p>UK nationals will be non-EU nationals from the first day following the Brexit.</p> <p>The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work”.</p>
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Slovenia or will there be a free-movement grace period of some kind?</b>	UK nationals will continue to have free access to Slovenia’s labour market through 31 December 2020. However, they will be treated as non-EU nationals immediately after Exit Day with regards to their ability to reside in Slovenia, and they will be required to apply for a residence permit.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	Not relevant. UK nationals will be visa exempt for business visits following Exit Day, and they will continue to have free access to Slovenia’s labour market through 31 December 2020. They will not, however, be free to reside in Slovenia and will be required to apply for a residence permit if seeking to remain in-country for more than 90 days in a 180-day period.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required for all activities outside the allowable scope and/or duration of a business visit. The primary category of work authorisation is the Single Permit, which can be granted for a wide range of transfer types, with eligibility criteria depending on the transfer type and duration of stay.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as one day to as long as 65 days.



# Spain

## Rules for UK Nationals Already Living in Spain

<b>What administrative steps must UK national residents take to acquire/retain their status in Spain?</b>	UK nationals who have been resident for under 5 years must apply for a special national identity card, which would be valid until the applicant reaches five years of residence, within the grace period.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	21 Months from Exit Day
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	No. However, note that this is because it is already mandatory for citizens of EU member states to register if they will be residing in Spain for more than 90 days.  However, UK nationals without an EU registration certificate must first apply for a special residence permit before applying for a special national identity card; and must demonstrate residence in Spain prior to the UK’s withdrawal, proof of sufficient funding and health insurance to qualify.
<b>Where can I find more information?</b>	<a href="https://www.lamoncloa.gob.es/brexit/Paginas/index.aspx">https://www.lamoncloa.gob.es/brexit/Paginas/index.aspx</a> and <a href="http://www.mitramiss.gob.es/es/brexit/index.htm">http://www.mitramiss.gob.es/es/brexit/index.htm</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Spain After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Spain or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Spain or will there be a free-movement grace period of some kind?</b>	UK nationals will be treated as non-EU nationals and would require work authorisation following standard processes.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	No.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	Work authorisation is required if the nature of the activity is work, irrespective of duration of stay or source of salary.  The Spanish immigration system has several work authorisation categories and frameworks for different circumstances, as well as residence permits that include authorisation to work, and work authorisation exemptions.
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 28 days to as long as three months.



# Sweden

## Rules for UK Nationals Already Living in Sweden

<b>What administrative steps must UK national residents take to acquire/retain their status in Sweden?</b>	UK nationals and their non-EU family members residing in Sweden for a period shorter than 5 years would be able to apply for a special temporary residence permit allowing them to continue working and residing in Sweden until they reach the five-year threshold.
<b>How long will they have to complete this process - in other words, how long is the “transitional” or “grace” period?</b>	12 months from Exit Day.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	<p>Yes. Also, the proposals in the memorandum mean that UK nationals and their family members who lose their right to live and work in Sweden as a consequence of the UK’s withdrawal from the EU will be exempt from the requirements of residence and work permits. The exemption will be introduced in a time-limited ordinance and apply during a transition period of one year. The proposal means that UK nationals and their family members may stay in Sweden during the transition period under similar conditions to today, giving them the opportunity of adjusting to the new situation.</p> <p>UK nationals who plan to travel outside Sweden during the twelve-month grace period after Brexit should apply for a passport stamp issued by the Swedish Migration Agency to prove their Swedish residency status.</p>
<b>Where can I find more information?</b>	<a href="http://www.government.se/government-policy/brexit/">http://www.government.se/government-policy/brexit/</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## UK Nationals Seeking to Enter Sweden After Brexit

<b>Will UK nationals immediately be treated as non-EU nationals when seeking to travel for business to Sweden or will there be a free-movement grace period of some kind?</b>	The EU has adopted a regulation confirming visa-free travel for UK nationals on tourist and business trips for up to 90 days in a 180-day period in Schengen countries. However, while visa-exempt for business, the presumption is that UK nationals will be permitted to conduct only “business” activities during short stays and not be permitted to engage in “work.”
<b>Will UK nationals immediately be treated as non-EU nationals following Brexit when seeking to work in Sweden or will there be a free-movement grace period of some kind?</b>	UK nationals would be treated as visa-exempt non-EU nationals, so they would not need a visa to enter Sweden but would have to obtain work and residence authorisation.
<b>Will there be any transition period before UK national business travellers are treated as non-EU nationals?</b>	New arrivals: Proposed legislative amendments were also presented that aim to make it easier for UK nationals and their family members to apply for residence and work permits in Sweden. It is proposed that the Government issues regulations that make it possible to be granted residence and work permits, even if they are already in Sweden.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which UK nationals will be able to obtain work authorisation after Brexit?</b>	<p>A work authorisation is required in the following circumstances: a foreign national executing any work beyond attending training, conferences and meetings. The primary category of work authorisation is the Work and residence permit. It can be granted for up to two years at a time and is generally granted for the period of employment.</p> <p>The main criteria are:</p> <ul style="list-style-type: none"> <li>• Valid offer of employment;</li> <li>• Salary levels and insurance coverage commensurate with Swedish Labour laws and/or industry practice; and</li> <li>• Job must have been advertised for at least ten days within EU (only for employment in Sweden).</li> </ul>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 30 days to as long as 130 days. Employers that are eligible to submit applications through Sweden’s Fast Track process can expedite this to two to three weeks.



# United Kingdom

## Rules for European Nationals Already Living in United Kingdom

<b>What administrative steps must UK national residents take to acquire/retain their status in United Kingdom?</b>	Applicants who do not have five years of continuous residence will typically be granted 'pre-settled status' that will allow them to remain in the UK for a further five years and then convert to settled status.
<b>How long will they have to complete this process - in other words, how long is the "transitional" or "grace" period?</b>	Through 31 December 2020.
<b>Are there any processes that must be completed now or soon after Exit Day to take advantage of the grace period?</b>	The rights and status of European nationals living in the UK on or before Exit Day will remain the same during the transition period to allow them to apply for status under the EU Settlement Scheme. In the event of a no deal, all European nationals must submit their applications by 31 December 2020.
<b>Where can I find more information?</b>	<a href="https://www.gov.uk/settled-status-eu-citizens-families">https://www.gov.uk/settled-status-eu-citizens-families</a> <a href="https://www.fragomen.com/sites/brexit/">https://www.fragomen.com/sites/brexit/</a>

## European Nationals Seeking to Enter United Kingdom After Brexit

<b>Will European nationals immediately be treated as third country nationals when seeking to travel for business to United Kingdom or will there be a free-movement grace period of some kind?</b>	During the transition period, the UK Government has proposed that European nationals will be able to travel to the UK without a visa and be admitted without restrictions on their activities. If the individual will stay beyond 31 December 2020, they must apply and obtain European Temporary Leave to Remain (TLR).
<b>Will European nationals immediately be treated as third country nationals following Brexit when seeking to work in United Kingdom or will there be a free-movement grace period of some kind?</b>	N/A
<b>Will there be any transition period before European national business travellers are treated as third country nationals?</b>	The transition period will run from Exit Day until 31 December 2020. European nationals entering on or after 1 January 2021 will need to follow the standard immigration rules in place at that time.
<b>At a high-level, what work authorisation programmes exist for non-EU nationals, or to put it another way, which European nationals will be able to obtain work authorisation after Brexit?</b>	<p>Work authorisation is required for all foreign nationals seeking to undertake work activities in the UK. The primary category of work authorisation is Tier 2 of the Points Based System, which is divided into multiple subcategories. It can be granted for up to five years, depending on the subcategory.</p> <p>Generally, the main criteria are:</p> <ul style="list-style-type: none"> <li>• Payment of the Skills Charge and Immigration Health Surcharge (unless an exemption applies);</li> <li>• A job offer from a UK employer;</li> <li>• Minimum salary requirements; and</li> <li>• A completed labour market test by the UK employer (unless an exemption applies).</li> </ul> <p>However, it is envisaged that there will be a new immigration system in place from 1 January 2021.</p>
<b>Generally, how long does the government take to process work authorisation applications from non-EU nationals?</b>	Government processing times can vary widely across work authorisation categories or based on individual circumstances, but they can range from as short as 9 days to as long as 31 days.

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