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Immigration and Global Mobility Update



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Global HR Lawyers

Ius Laboris

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Every two months, our experts from around the world put together an update on immigration and global mobility practice, setting out recent changes to the law, policies and procedures.

In this latest edition of our Immigration and Global Mobility Update, we explore new rules regulating quotas for residence and work permits, increases in salary thresholds for those permits, notification obligations for the end of foreign workers' employment, and much more.

In Ireland the government has opened a public consultation process to review the 'occupations lists' for employment permits, while the Italian Council of Ministers has given its preliminary approval to the Decree on migration flows for the period 2026–2028.

Quotas to apply for residence and work permits have recently been significantly changed in the Czech Republic, with increases and decreases depending on the embassy location. In Belgium, a 'Labour Shortage Professions' list has been published for the Brussels Region.

In the UK, changes have been implemented to the Skilled Worker Route and salary thresholds have been revised, with most thresholds being increased. The changes also remove 111 occupations from eligibility under the route, in line with the government's

aim to reduce net migration to the UK. In France, a new decree has amended the salary requirements for two residence permits for business immigration categories.

In Finland, a new amendment to the Aliens Act has entered into force requiring employers to notify the authorities when a foreign employee's employment ends, but those employees have been given an additional time period to find a new job. Meanwhile, Slovakia has tightened the conditions for obtaining temporary residence for the purpose of operating a business.

Find out the details of these and other changes below.



EXPERT GROUP CHAIR

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Be prepared for increased enforcement

Heading into the second half of 2025, employers must be prepared for the increased possibility of unannounced inspections or detailed monitoring requests from the Australian Border Force and Fair Work Ombudsman. Here are some of the steps employers should take.

Conduct regular internal compliance reviews: Partner with external providers to undertake internal compliance reviews. It is far easier to address non-compliance internally than it is to wait for an inspector to identify it and compel certain actions or impose sanctions.

Keep records organised and accessible: One of the first things inspectors will ask for is evidence of compliance (e.g. payslips, time sheets, copies of visa and work rights checks). Ensure your record-keeping is up to date and that you can retrieve records quickly. Ensure

files are maintained (even after the employment relationship ends). Missing or chaotic records raise red flags and can prolong an investigation.

Comply with inspectors: It is critical to understand the roles and rights of inspectors and your obligations to cooperate with inspectors. Provide training to relevant persons within the organisation on inspection protocols.

Stay informed: Legislative changes are regular and fast paced. It is important to ensure you have a system in place to stay across the changes and understand your obligations.

Belgium



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New list of Labour Shortage Professions in Brussels Region

Starting 1 October 2025, an authorisation to work in the Brussels Region can be obtained for third country nationals in so-called 'Labour Shortage Professions' without a labour market test.

A new list providing for 82 shortage professions applies as of 1 July 2025 and can be found here: <https://economy-employment.brussels/autorisation-work-profession-shortage>

Flemish chain liability – employment of third country nationals

In 2024, the Flemish Government tightened its chain liability rules. The rules introduced a duty of care requiring contractors to collect additional data and documents related to the employment of third country nationals (both salaried employees and self-employed workers) from their direct subcontractors. Initially the rules were due to

enter into force on 1 January 2025 but (as previously reported) the entry into force was postponed until 1 January 2026.

Originally these rules were applicable across all sectors, but a new Decree of 27 June 2025 now restricts them to high-risk sectors, in an effort to reduce the administrative burden for lower-risk sectors or those with relatively infrequent use of subcontractors. The Flemish Government still needs to determine the high-risk sectors to which the rules will apply.

The new Decree also expands its scope. At present, the liability rules apply to contractor-subcontractor relationships, but in the future principals will be added to the liability chain to maintain consistency.

The new regulations will take effect on a date to be set by the Flemish Government but no later than 1 January 2026.

Czech Republic



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Increased quotas for residence and work permits

Starting from 1 July 2025, amendments to certain immigration quotas entered into force. The amendments affect the government regulation which sets the maximum annual number of applications for visas for stays exceeding 90 days for business purposes, applications for long-term residence permits for investment purposes, and applications for employee cards in the territorial jurisdiction of the various Czech embassies.

The government approved the following changes:

- » **Increasing quotas** at the Czech embassy in Delhi for the Digital Nomad Programme.
- » **Introducing quotas** for the issuance of employee cards for workers from China (embassies in Beijing and Shanghai).

- » **Effective cancellation of the so-called residual quota** at a total of five embassies in Africa (embassies in Addis Ababa, Cairo, Lusaka, Pretoria and Rabat).
- » **Increasing quotas** at the embassy in Bangkok.
- » **Introduction of quotas** for applications for employee cards at embassies in Tokyo and Taipei, but not for citizens of those two countries (this is aimed at foreigners residing in Japan or Taiwan for at least two consecutive years who are thus eligible to file applications at those embassies).

Quotas are therefore being adjusted again in response to current practices and needs (though not always to the benefit of employers or employees).

Europe



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Gradual start of the Entry /Exit System (EES)

A 2017 EU regulation laid the foundation for the EU's Entry/Exit System (EES), an advanced IT framework to digitally log border crossings for short-stay visits by non-EU nationals. Its primary goals include strengthening border security, accelerating control procedures, and reducing risks of identity fraud and overstays.

To allow for a smoother rollout, as of 26 July 2025 the European Commission introduced a further regulation which allows for a progressive start to the EES, despite the original mandate that all member states begin implementation simultaneously. Member states now have the option to implement the EES gradually over a period of 180 days, in accordance with the procedures described in the text. However, this remains voluntary, meaning that EU member states may deploy the system all at once if they wish.

The EES is not yet operational;

more information about its start date will be communicated by the European Commission.

EU Council extends temporary protection across the EU for Ukrainian nationals until 4 March 2027

In light of the continued war in Ukraine, the European Council has extended the temporary protection of Ukrainian nationals for a further period of one year until 4 March 2027.

The temporary protection applies to Ukrainian nationals and their family members, as well as to stateless persons or non-Ukrainian nationals and their family members who were legally residing in Ukraine before 24 February 2022.

Under the temporary protection scheme, protected nationals may legally work and reside within the relevant EU member state where they are registered under the scheme.

Finland



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New notification obligation for Finnish employers

An amendment to the Aliens Act entered into force on 11 June 2025, requiring employers to notify the Finnish Immigration Service if the employment of a third-country employee residing in Finland under a work-based residence permit ends prematurely before the permit expiry date. This notification must be submitted within 14 days of the end of the employment relationship.

Notifications should primarily be submitted online through the Enter Finland service. If online submission is not possible, the notification may be filed using a paper form.

The occupational safety and health authority supervises compliance with this notification obligation. An employer's failure to submit a notification, or failure to comply with related requests from the authority, is punishable by a fine and may also lead to the temporary

suspension of new work-based residence permits for the employer.

Specifications regarding the time frame for finding new work in Finland

Amendments to the Aliens Act have introduced a rule commonly referred to as the 'three/six-month unemployment rule'. The amendments entered into force on 11 June 2025.

Under this new rule, an employee working in Finland under a work-based residence permit generally has three months to find a new job if their employment ends prematurely. If they cannot secure new employment and there are no other grounds for staying in Finland, their residence permit can be cancelled.

A longer six-month jobseeking period applies to:

- » specialist workers (including EU Blue Card holders);

- » anyone who has lived in Finland for more than two years with a work-based residence permit;
- » individuals in middle or top management; and
- » seconded specialist workers and managers moving within an organisation.

Holders of a residence permit for an employed person can, under the same permit, apply for jobs within the sector of work specified in the permit or switch to another sector verified as a labour shortage sector throughout Finland.

France



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Transposition of EU Blue Card Directive

The EU Blue Card allows highly qualified foreign nationals to obtain a multi-year residence permit (up to four years, renewable) to undertake salaried employment in France without the need for prior work authorisation.

The newly transposed Directive makes the following changes to eligibility conditions for the Blue Card:

- » The employee must enter into an employment contract of at least six months with a French entity (previously this was one year).
- » The employee must hold at least a Bachelor's degree or have five years' professional experience in a similar role and level. This condition has been extended and, for certain activities, three years' experience acquired within the preceding seven years will be sufficient (a list of such activities has not yet

been published).

Specific provisions relating to the employer have been introduced, allowing the authorities to reject a residence permit application if:

- » the French company was created or operates primarily to facilitate the entry of third-country nationals; or
- » the employer is non-compliant with social security, labour or tax legislation or has been convicted of illegal employment.

Measures to facilitate intra-EU mobility have also been adopted. A holder of an EU Blue Card issued by another EU Member State may now settle in France after one year (instead of 18 months previously) without being required to obtain a visa to enter France. The residence permit application is submitted once the individual has arrived in France.

New decree amending salary requirements for certain business immigration categories

France offers various favourable residence permits for business immigration, granting the right to work without the need for a separate work authorisation.

The EU Blue Card is one such permit. However, two other categories are of interest to employers. The *Talent – Qualified Employee* status is designed for foreign graduates who wish to commence their professional activity in France. The *Talent – Employee on Assignment* status is designed for assignments within a group and involves a co-employment arrangement where the employment relationship with the foreign employer is maintained.

Previously, the salary requirements were EUR 43,243 for the Qualified Employee category and EUR 38,918.88 for the Employee on Assignment category.

A decree dated 13 June 2025 has amended the salary requirements for those two residence permits to a 'gross reference salary'. A ministerial order dated 2016 set the gross annual reference salary at EUR 35,891. However, it has not yet been confirmed by the government whether that 2016 figure now applies to these two categories, creating uncertainty for both individuals and their employers regarding the applicable salary requirement. A

further decree is expected in the near future to set a new gross reference salary.

New decree on satisfactory knowledge of the French language and civic exam to obtain certain French residence permits

Following the new Immigration Act of January 2024, to obtain and renew certain residence permits (notably the 'Employee' status or permanent residence permit, but not 'Talent' residence permits), applicants must demonstrate:

- » satisfactory knowledge of the French language; and
- » completion of a civic training.

A decree dated 15 July 2025 provides new details on the above obligations.

The civic exam has been identified as a multiple-choice test covering subjects including the values of the French Republic, political and institutional systems, citizens' rights and duties, French history, geography, and culture. Applicants must achieve a minimum score of 80% correct answers to fulfil this requirement.

For satisfactory knowledge of the French language, applicants must demonstrate proficiency in French according to the Common European Framework of Reference for Languages (CEFR) as follows:

- » level A2 for applicants seeking a multi-year residence permit (notably under 'Employee' status);
- » level B1 for applicants seeking a permanent residence permit.

A separate decree dated 15 July 2025 has also strengthened the requirements for naturalisation:

- » a minimum level B2 on the CEFR (previously B1);
- » a civic training exam will replace the traditional assimilation interview with a public officer (details not yet available).

Ireland



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Public consultation process to review occupations lists for employment permits opened

The Department of Enterprise Trade and Employment has opened a public consultation process to review the occupations lists for employment permits.

The Department is responsible for administering Ireland's employment permit system, which is designed to fill labour market shortages in Ireland. To do this, the Department maintains two occupations lists:

- » The Ineligible Occupations List – occupations for which there is an adequate supply of labour and skills within Ireland and the European Economic Area (EEA), for which an employment permit will not be issued.
- » The Critical Skills Occupations List – occupations for which labour and skills are in short supply in Ireland and the EEA, for which a critical skills

employment permit may be obtained (subject to other criteria being satisfied).

The last review of the occupations lists took place in 2023. At that time, 11 additional roles were added to the Critical Skills Occupations List, deeming them eligible for a critical skills employment permit. A further 32 roles were removed from the Ineligible Occupations List, deeming them eligible for a general employment permit.

Therefore, this consultation process is an excellent opportunity for employers and stakeholders to provide feedback on occupations they believe:

- » should be eligible for an employment permit, or
- » should be added to the Critical Skills Occupations List.

The consultation process closes at 17:00 on 19 September 2025.

Italy



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New work visa for descendants of Italian citizens

A recent law introduces a new pathway for descendants of Italian citizens to obtain a national D visa and residence permit for employees in Italy, without being subject to the annual quota system established under the so-called 'Flow Decree'.

To be eligible, the applicant must have received an employment offer from an Italian company. In addition, the applicant must reside outside of Italy and be a descendant of an Italian citizen, although the specific documentation required to prove the family connection has yet to be clarified. Furthermore, the applicant must be a national of a country with a historical pattern of significant migration flows to Italy, with the list of eligible countries to be established by an upcoming inter-ministerial decree.

This new visa represents an opportunity for individuals of Italian descent who no longer qualify for citizenship by descent under the revised rules.

Migration Flow Decree for 2026–2028 approved

On 30 June 2025, the Council of Ministers gave preliminary approval to the Decree on migration flows for the period 2026–2028, which regulates the regular entry of non-EU workers into Italy. The measure aims to ensure the availability of essential labour for the national economy and combat irregular migration.

For 2026, 164,850 entries are planned. A total of 497,550 authorisations are envisioned over the three-year period, broken down as follows:

- » 230,550 entries for non-seasonal and self-employed work; and
- » 267,000 entries for seasonal work in the agricultural and tourism sectors.

The government also stated that it intends to promote out-of-quota entries, gradually phasing out the current 'click day' system, with a focus on the most in-demand job profiles and enhanced training in countries of origin.

Citizenship Referendum rejected; current immigration rules remain in place

On 8 and 9 June 2025, Italy held a referendum aimed at shortening the residency requirement for naturalisation from ten to five years. The referendum did not pass due to low turnout: only around 30% of eligible voters participated, falling short of the 50% quorum required by the Constitution.

The existing legal framework therefore remains in place. Citizenship by descent continues, but it was recently made more restrictive: the applicant must have an immediate Italian ancestor (parent or grandparent), and stricter requirements to prove descent have been introduced as well as additional conditions such as effective residency or tangible ties to Italy.

Meanwhile, foreign nationals seeking naturalisation by residence must still fulfill the ten-year legal-residence requirement, alongside integration benchmarks like language proficiency, income, clean criminal record, and tax compliance.

Kazakhstan



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New domestic search obligation for employers

From 1 September 2025, [amendments](#) to the legislation regarding the conditions for issuing Work Permits will come into force in Kazakhstan.

The amendments require employers to search for suitable candidates in the domestic labour market before applying for a Work Permit. The search for candidates is done by providing information about relevant vacancies to the national electronic labour exchange. After 15 calendar days from the date of submission of this information, the employer can apply for a Work Permit.

New tax rates for foreign workers

A new amended Tax Code was adopted on 8 July 2025 and will enter into force starting 1 January 2026. The amendments contain, among other things, the new rates for the individual income tax (IIT). For foreigners working in Kazakhstan, the IIT rate will be 10% if they earn up to 600,000

MCI per year (approximately up to USD 4.5 million). If their annual income exceeds this threshold, the IIT rate increases to 17%.

Lithuania



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Non-biometric Russian passports no longer valid for entry into Lithuania

Effective 1 June 2025, non-biometric passports issued by Russia are no longer recognised as valid travel documents for entry into Lithuania.

Exceptions apply in the following cases:

- » The order does not apply to transit travel of Russian citizens through Lithuania by rail between Kaliningrad and Russia.
- » It is possible to satisfy requests from certain Russian citizens (e.g. representatives of democratic forces, opponents of the regime, representatives of independent media and society) to enter with a non-biometric passport in individual cases, if the purpose of entry meets the national interests of Lithuania.

The order will not take effect until

1 December 2025 for Russian citizens holding a residence permit in Lithuania or another EU, EEA, or Schengen Member State, giving them time to exchange their non-biometric Russian passports for biometric ones.

Slovakia



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New rules for obtaining temporary residence for the purpose of business

As of 1 July 2025, Slovakia has tightened the conditions for obtaining temporary residence for the purpose of operating a business.

According to the new rules, foreigners can no longer apply for temporary residence in person at a police department in the Slovak Republic, but only at the competent Slovak diplomatic mission abroad. In addition, foreigners applying for this type of residence permit will be required to submit a business plan as a mandatory part of their application. Other changes to the process of applying for the residence permit apply as well.

Proceedings for temporary residence for the purpose of operating a business that were initiated before 30 June 2025 will be completed according to the old regulations, unless the new rules effective from 1 July are more favourable for the applicant.

Temporary residence permits granted before 30 June 2025 will remain valid until their expiration.

Türkiye



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Work permit exemption for Cross-Border Service Providers

Cross-Border Service Provider ('CBSP') is now a category of work permit exemption in Türkiye. CBSP status allows foreign nationals to perform productive work in Türkiye temporarily under certain conditions without the need for a work permit.

The following are eligible work activities for CBSP when performed for a Turkish hosting entity:

- » non-technical consultation work (including scientific and statistical research, market research and analysis, and participation in training on business techniques);
- » freight and passenger transportation;
- » translation and interpretation services.

CBSP status is open to foreign professionals sent to Türkiye either by their foreign employer or as an independent professional consultant.

Applications can be filed either through the Turkish Consulate in the assignee's home country or domestically in Türkiye while the assignee is in visa or visa exemption status in Türkiye.

If the applicant is abroad, the application is submitted through the local Turkish Consulate. Processing takes approximately one to three weeks and approved applicants receive an online certificate which will allow them to reside and work in Türkiye. However, before entering Türkiye, the applicant must return to the Consulate and submit the online certificate to obtain the visa stamp on their passport.

If the applicant is already in Türkiye under visitor status, the application is submitted directly to the Ministry of Labour's online application portal (emuafiyet.csgeb.gov.tr/). All required documents are reviewed by the



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Ministry of Labour electronically. Processing takes approximately one to three weeks and approved applicants receive an online certificate which will allow them to reside and work in Türkiye.

CBSP status can be granted for up to 90 cumulative days within 180 days. The status can be issued once per six-month period from the issuance of each status.

Salary and social security premiums must continue to be paid by the employer abroad or by an independent contractor in the person's home country.

Ukraine



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Ukraine introduces multiple citizenship

As of 16 January 2026, a new law allowing multiple citizenship will come into force in Ukraine. Ukrainian nationals may obtain foreign citizenship without losing their Ukrainian citizenship, provided the foreign country is included on a list approved by the Cabinet of Ministers.

Foreign nationals will be eligible to:

- » acquire Ukrainian citizenship through a simplified procedure if they are of Ukrainian origin;
- » retain their existing citizenship while obtaining Ukrainian citizenship (excluding citizens of an aggressor state);
- » obtain Ukrainian citizenship under a simplified process during or after service in the Armed Forces of Ukraine.

All applicants for Ukrainian citizenship must pass mandatory examinations without exemptions or deferrals.

United Kingdom



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New Skilled Worker route restrictions from 22 July 2025

Following on from the government's immigration [White Paper](#), published in May, the following changes to the Skilled Worker route will apply for Certificates of Sponsorship assigned from 22 July 2025:

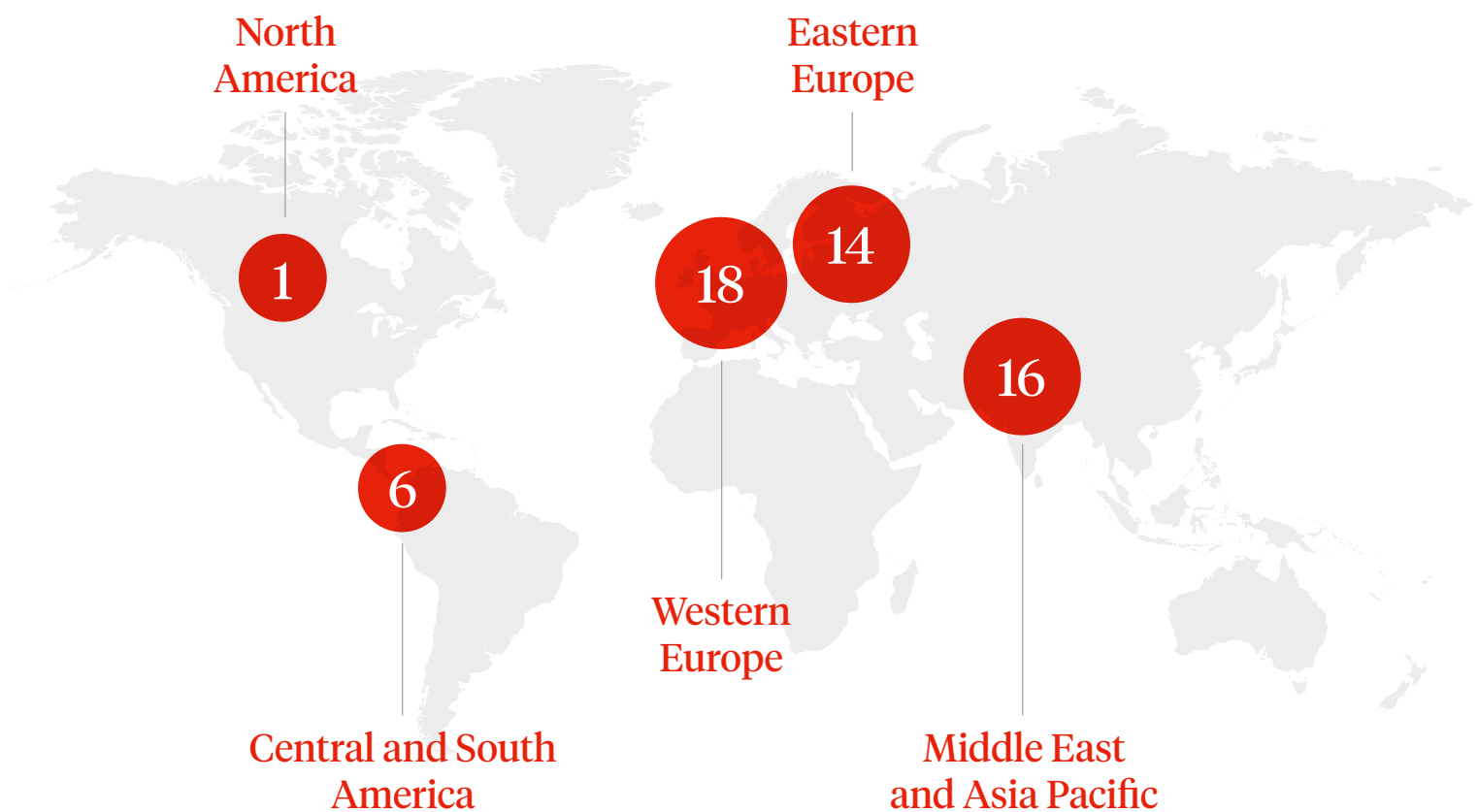
- » Only RQF Level 6 (graduate level) or higher skilled roles are eligible for sponsorship, except that medium-skilled roles at RQF Levels 3-5 remain eligible if they appear on either the Immigration Salary List (ISL) or the new Temporary Shortage List (TSL).
- » Main applicants in ISL or TSL roles are not eligible to bring dependants, unless limited exceptions apply.
- » Care workers and senior carers can only make applications from within the UK and where transitional arrangements apply.

Salary thresholds have also been revised in line with the latest labour market salary data, with most thresholds being increased.

These changes remove 111 occupations from eligibility under the route, in line with the government's aim to reduce net migration to the UK.

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