

# PRO HR

## IMMIGRATION UPDATE

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DECEMBER 2025

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## NEW LIST OF DOCUMENTS REQUIRED FOR WORK PERMITS AND DECLARATIONS ON ENTRUSTING WORK

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A new list of documents that an employer must attach to an application for a work permit or a declaration on entrusting work to a foreign national has been published.

Currently, every application for a work permit and every declaration on entrusting work must include:

1. a copy of all the non-blank pages of the foreign national's passport,
2. documents confirming that the qualification requirements and other conditions are met – in the case of an intention to entrust work to a foreign national in a regulated profession,
3. the application fee,
4. the employer's criminal declaration,
5. the employer's declaration stating whether, to the best of their knowledge, the foreign national concerned by the application or declaration has been lawfully convicted of selected offences.

Applications for work permits issued for the benefit of a Polish entity and declarations on entrusting work must additionally include:

- a. if the entity entrusting the work is a temporary employment agency – a document drawn up by the user employer confirming the agreement on the posting of a foreign national,
- b. the employer's declaration that the remuneration specified in the application or the declaration on entrusting work is not lower than the remuneration of employees performing work of a comparable type or in a comparable position,
- c. the employer's declaration confirming possession of the financial means or sources of income necessary to cover the obligations arising from entrusting work to a foreign national.

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## CHANGES TO THE APPOINTMENT SYSTEM AT THE MAŁOPOLSKA VOIVODESHIP OFFICE IN KRAKOW

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The Małopolska Voivodeship Office in Krakow has disabled the option of booking an appointment to submit an application for a temporary residence permit, a permanent residence permit or an EU long-term resident permit via the online appointment form. According to information provided by the office, all available appointment slots have been filled.

At present, the preferred method of submitting a residence permit application is by post.

Appointments previously arranged using the appointment form will remain valid, with foreign nationals able to submit their residence applications on the scheduled date. If a new electronic procedure for initiating cases (MOS 2.0) is introduced, the office plans to cancel those appointments scheduled for dates falling after the launch of the new system. It has not yet been confirmed from which date appointments will be cancelled.

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## HIGHER FEES FOR WORK PERMITS AND DECLARATIONS ON ENTRUSTING WORK

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As of 1 December 2025, the fees for applications for work permits and declarations of entrusting work have been increased.

The current fees are:

1. PLN 200 – where the employer intends to entrust work to a foreign national on the basis of a work permit for a period not exceeding three months,
2. PLN 400 – where the employer intends to entrust work to a foreign national on the basis of a work permit for a period exceeding three months, or on the basis of a declaration on entrusting work,
3. PLN 800 – where the employer intends to post a foreign national to Poland,
4. PLN 100 – where the employer intends to employ a foreign national on the basis of a seasonal work permit.

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## RESTRICTIONS FOR GEORGIAN CITIZENS

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Since 1 December 2025, Georgian citizens can no longer legalise their employment on the basis of declarations on entrusting work, though declarations already issued remain valid.

Employers wishing to hire a Georgian citizen must now apply for a work permit.

In addition, the European Union has adopted amendments to the rules governing visa-free entry for third-country nationals.

The new rules introduce additional grounds for suspending visa-free

entry, including situations where nationals of a third country entering the EU under the visa-free regime significantly contribute to an increase in serious crime in one or more EU Member States.

It is anticipated that Georgia will be among the countries whose citizens will soon be deprived of the right to visa-free entry to the EU. Should such a restriction be introduced, Georgian citizens will still be allowed to enter the EU, but only if they hold a visa or a residence permit issued by a Member State.

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## UPDATED TEMPLATES FOR TEMPORARY RESIDENCE PERMIT APPLICATIONS

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Foreign nationals are required to submit applications for temporary residence using the new form. The updated form includes a new purpose of stay – long-term mobility of an EU Blue Card holder.

In addition to the application form itself, the templates for the annexes have also been updated.

Annex No 1 to the application now additionally requires the employer to provide the foreign national's occupation code, in line with the classification of occupations and specialisations for the labour market.

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## NEW LIST OF EXEMPTIONS FROM THE REQUIREMENT TO HOLD A WORK PERMIT OR A DECLARATION ON ENTRUSTING WORK

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The Ministry of Family, Labour and Social Policy has published a list of situations in which a foreign national legally residing in Poland may work without a work permit or a declaration on entrusting work.

The list is similar to the previously applicable set of exemptions. Among others, individuals posted to Poland to implement an armaments programme carried out under an agreement to which Poland is a party, or those performing work within an EU education and training programme, may work without a permit.

A significant change is the introduction of restrictions on free access to the labour market for full-time students. Currently, only those full-time students who study in Poland at an institution approved by the minister competent for internal affairs as able to admit foreign nationals to commence or continue studies, or at an institution exempt from this requirement and not subject to a decision prohibiting the admission of foreign nationals, may work without a permit.

Previously, all full-time students had unrestricted access to the labour market.

For employers, this change means that, when hiring a foreign national who is a full-time student, they will have to confirm whether the student is enrolled in a programme that entitles them to work without a permit.

Under the new provisions, foreign nationals who met the conditions for exemption from the requirement to hold a work permit under the previous rules, but who no longer qualify under the new rules, may continue to benefit from the old entitlements until 1 June 2026 at the latest. After this date, they will be required to hold a work permit in order to remain in legal employment.



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