

# BREXIT

## Post - Brexit Arrangements: Facts

The United Kingdom ceased to be a member of the European Union on 31 January 2020. The transition period began on 31 January 2020 and ended on 31 December 2020.

On 24 December 2020 the United Kingdom and the European Commission have reached an agreement on the terms of their cooperation following the end of the Brexit transition period. The Agreement was signed by both parties on 30 December 2020.

## EU citizens in the UK

- **Those who arrived before 31 December 2020.**  
Their rights to work, live and study are protected. They have until 30 June 2021 to apply to the EU Settlement Scheme.

EU Settlement Scheme	
Pre-settled Status	Settled Status
Granted to EU nationals and their family members, who have lived in the UK for less than 5 years.	Granted to EU nationals and their family members, who have lived in the UK continuously for at least 5 years.
Issued for a period of 5 years and can be changed to settled status after that.	There is no time limit on EU national stay in the UK
Family members in a relationship with the EU citizen, which existed before 31 December 2020 will be able to join them in the UK at any point in the future.	Family members in a relationship with the EU citizen, which existed before 31 December 2020 will be able to join them in the UK at any point in the future.
Family members in a relationship with Swiss national, which existed before 31 December 2025 will be able to join them in the UK until 31 December 2025.	Family members in a relationship with Swiss national, which existed before 31 December 2025 will be able to join them in the UK until 31 December 2025.

- **Those arriving from 1 January 2021.**  
They are required to meet UK immigration regulations as other non – EU citizens and obtain a work permission and visa in order to work in the UK.

## UK citizens in EU

- **Those who arrived before 31 December 2020.**

Their rights to work, live and study are protected. They have until 30 June 2021 to apply to the EU Settlement Scheme. Their rights to work, live and study are protected. UK nationals residing in an EU country should complete any requisite national registration requirements to demonstrate their legal stay or apply for a cross-border worker status. UK nationals who do not complete necessary registrations may lose their work and residence rights stemming from the withdrawal agreement. Those who resided in the EU country for 5 years may be allowed to apply for permanent residence.

UK nationals may be required to apply for a new residence status document under the Withdrawal Agreement (Article 50 Residence Permit) or Frontier Worker Permit before 30 June 2021. The terms and procedures for applications vary between EU countries. The table below provides published details:

Country	Application process for UK citizens
Austria	<p>In order to apply for the new Article 50 permit UK nationals and their eligible family members, must have established their residence in Austria before the end of 2020 by registering their address with a local Registration Office. Applications can be filed until 31 December 2021. In person appointment is required. Until the new permit is issued, individuals can evidence their status with their EU registration certificate, plus their Article 50 permit submission confirmation (once issued). UK nationals with at least five years' residence may apply for a permanent residence permit, even if they reach five years' residence after 31 December 2020. Posted workers who hold EU registration can switch to an Article 50 permit, if they have received the Registration certificate (yellow paper) and they should do this before 30 June 2021. <b>Cross-border workers are also advised to apply for an Article 50 permit by 30 June 2021. Cross border workers and posted workers, who established their status before 31 December 2020, but not eligible for an Article 50 permit, should be able to continue working until their assignment end.</b> Subsequently poster workers will need to obtain work authorisation as other non-EU nationals. Employers must ensure that they track notification expiry dates for posted workers as no transition or grace period is in place. UK nationals could also apply for a new permit under general provisions for individuals who lost EU citizenship before 30 June 2021.</p>
Belgium	<p>UK citizens and their eligible family members will receive a letter asking them to go to the municipality where they reside to apply for their new residence card by 31 December 2021. In person appointment at town hall of residence or work is required. Until the new permit is issued, individuals can evidence their status with their current proof of status (E/E+ card for UK nationals, F/F+ card for family members) and they can be used for travel purposes until 31 December 2021. UK nationals with at least five years' residence can apply for a 10-year permanent residence M-card. Cross-border workers with established status (Annex 15) before 31 December 2020 should apply for an N-card once applications open. Posted workers with establish status before 31 December 2020, may continue their activities only if they qualify for residence or for the cross-border worker status, and must then apply for an M-card or N-card (once applications open).</p>

Country	Application process for UK citizens
Bulgaria	<p>UK citizens and their eligible family members legally residing in Bulgaria on 31 January 2020 or have a valid residence permit will retain residence rights in Bulgaria and they can use their permit up to 1 year after the end of the transition period or up to the expiry of the validity of the document – whichever comes first. To continue residing, they will need to submit an application for the renewal of their residence permit or for the issuance of a new residence permit. The applications are open and should be submitted in person to the Migration Directorate or the relevant Migration Office at the Regional Directorate of the Ministry of Interior. There are no specific arrangements for cross-border workers. Until the new permit is issued, individuals can evidence their status with their current EU Residence Certificate or family member residence permit.</p>
Croatia	<p>Applications for a new residence permit must be submitted before 30 June 2021. UK citizens and their eligible family members residing in Zagreb can file it online. In other locations, in- person appointment is required. Non-EU family members who have not resided in Croatia by 30 December 2020 may apply for a temporary stay permit within 6 months of entering Croatia. Cross-border workers with an established status before 31 December 2020 are required to apply for a frontier worker permit in order to continue their activities.</p>
Cyprus	<p>Current Residence documents held by UK citizens and their eligible family members will be valid and can be voluntarily replaced with the new residence document under the Withdrawal Agreement. There is no deadline for applications. They are filed in person at the Civil Registry and Migration Department in Nicosia or the District Units of the Aliens and Immigration Service in the city where the applicant is living. Until the new permit is issued, individuals can evidence their status with their EU registration document. There are no specific arrangements for cross -border or posted workers and they may need work authorisation</p>
Czech Republic	<p>British citizens and their eligible family members who resided in Czech by 31 December 2020 should secure a certificate of temporary residence at the earliest. It is expected that an application system for a new non-EU permit card will open on 2 August 2021. British citizens on local contracts before 31 December 2020 can continue to work or switch to another employer without needing a work permit. British citizens posted to work before 31 December 2020 can complete their assignment. However they are required to obtain a work permission for any subsequent activities, ideally before 31 December 2021. Cross-border workers with established status by 31 December 2020 can maintain their access to cross-border employment.</p>
Denmark	<p>Application for a new residence status document to the Danish Agency for International Recruitment and Integration (SIRI) required. Applications may be submitted before 31 December 2021. British citizens and their eligible family members will be invited to apply. Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit. Cross-border workers with established status by 31 December 2020 can continue their activities. They can apply now to receive a cross- border worker permit.</p>

Country	Application process for UK citizens
Estonia	<p>British citizens who resided in Estonia or arrived in Estonia before 31 December 2020 must ensure that their place of residence in the registries is up to date or they register before 31 March 2021. It is also important that they apply for an EU national ID card. They must apply to change their EU ID card to an Article 50 permit before expiry of the current EU ID card or family member residence permit. Applications are open can be filed by email or in-person. Cross-border workers and posted workers who do not intend to reside in Estonia can continue their activities until 31 March 2021. They may be required to apply for work permission after that.</p>
Finland	<p>Applications for a right of residence under the withdrawal agreement are open and should be submitted by 30th of September 2021. There are no specific arrangements for cross-border workers.Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member permit.</p>
France	<p>Applications for a new residence permit under the Withdrawal Agreement are open and individuals must apply online before 1 July 2021. Those who have been resident in the UK for less than 5 years can obtain Article 50 permit valid for one to five years depending on their circumstances. Those who have resided for over 5 years by 31 December 2020 period can obtain 10 years permanent residence. Cross-border workers resident in France can apply for a permit through the online system. Cross-border workers not resident in France can apply for Article 50 frontier worker permit. The application system for the latter is not open yet. Until the new permit is issued, individuals will have no proof of their status as most British citizens do not hold registration certificates under the EU pre-Brexit regulations. British citizens who started their assignment in France before 31 December 2020 and are eligible to register under the Withdrawal Agreement should apply at the earliest to avoid difficulties when entering France.</p>
Germany	<p>British citizens and their eligible family members who have had their residency in Germany on 31 December 2020 must register with the local immigration office by 30 June 2021 to obtain residence permit under the Withdrawal Agreement (document “Aufenthaltsdokument -GB”). In person application is required to enrol biometrics. Until the new permit is issued, individuals can evidence their status with their confirmation of registration of residential address. If individual intends to travel abroad, they may apply for a temporary permit prior to issue of residence card. Cross-border workers with an established status before 31 December 2020 must also apply to receive a special residence permit to confirm their status and continue their activities.</p>
Greece	<p>UK citizens who have arrived and registered with relevant Authorities in Greece before the end of December 2020 can now submit an application for a residence permit under the Withdrawal Agreement. Applications must be submitted before 30 June 2021. Until the new permit is issued, individuals can evidence their status with their EU registration certificate plus evidence of submitted application once filed. There are no specific arrangements for cross- border workers.</p>
Hungary	<p>All UK nationals must have collected an EU Residence Registration card from the Immigration Office by 1 January 2021 in order to be eligible to retain rights under the Withdrawal Agreement. Applications for the National Permanent Residence Permit are open and must be submitted by 31 December 2021. Cross-border workers and posted workers ordinarily resident in Hungary as of 31 December 2020 and on a local contract or conducting work in Hungary on regular basis may also apply for a National Permanent Residence Permit.</p>

Country	Application process for UK citizens
Iceland	UK citizens should have registered their domicile with Registers Iceland as residents in Iceland by 31 December 2020. Applications for a new residence document are expected to open sometime in January 2021. Non-EU national family members of UK citizens registered before 31 December 2020 will continue to apply for family reunification under the old EU rules. There are no arrangements for cross-border workers even for those who carried out cross-border activities before 31 December 2020. Work authorization will be required.
Italy	UK citizens and their eligible family members should apply for a new 'attestazione' a registration document by in person appointment at the local Police Headquarters / Immigration Police. There is no time limit within which this should be obtained, but individuals are advised to do that before 30 June 2021. Those who have obtained the new 'attestazione' document can apply for residence permit card valid for up to 5 years or permanent residence card valid for up to 10 years. They will be issued as electronic documents. Frontier workers with an established status before 31 December 2020 can request for a document certifying their status from the Police department in the province where their work is based to be able to continue their activities. The document will be issued with validity of 5 years. UK national students holding an electronic residence permit, issued by the local Police Headquarters / Immigration Police) may continue to renew their permit until the end of the course of study.
Latvia	British citizens and their eligible family members must submit, before 30 June 2021, an application to the Office of Citizenship and Migration Affairs (OCMA) and obtain a new residence permit. Application system is open. Applicants do not longer need to wait for an invitation letter. Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit plus evidence of submitted application once filed. Cross-border workers with an established status before 31 December 2020 should also apply for status under the Withdrawal Agreement to continue their activities.
Lithuania	Applications for the new Article 50 permit are open. Current EU residence registration and non-EU family member documents remain valid, but an application for the new permit must be submitted before the expiry of the existing one. Those who wish to travel should apply at the earliest to avoid any travel restrictions. Applications are submitted online through Lithuanian Migration Information System and applicants are required to book a biometric appointment. UK nationals who had resided in Lithuania for a period of at least 5 years as of 31 December 2020 may apply for a 5 years residence permit. Those who resided for at least 10 years as of the end of the Brexit transition period may apply for permanent residence. Cross-border workers with established status by 31 December 2020 can continue their activities. No specific arrangements for such workers are proposed yet.
Liechtenstein	British citizens resident in Liechtenstein prior to 1 January 2021 must register upon arrival to secure their residence rights. Those already registered do not need to register again. Any rights obtained under the regulation before 1 January 2021 will remain valid. British citizens holding cross-border permits will also retain their rights from 1 January 2021. If their permit expire, they must renew it following the process in place.

Country	Application process for UK citizens
Luxembourg	Applications for a new Article 50 permit are open now and must be submitted before 30 June 2021. Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member permit. Cross-border workers with established status by 31 December 2020 can apply for a special 10 years cross border worker permit. Applicants must be employed in Luxembourg, or have regular employment there to be eligible. Non- EU family members of UK cross border workers require work authorisation. Workers posted to Luxembourg require work authorization as other EU nationals in order to continue their assignment after 1 January 2021.
Malta	All UK nationals resident in Malta and already in possession of an EU Residents Certificate will receive information from Identity Malta to exchange their documents for one reflecting the new status. Applications are open. Applicants are required to personally submit their application by calling at Identity Malta's Expatriates Unit in Valley Road, Msida on the dates indicated in the letter they will be receiving. Applicants residing in Gozo would need to apply at the eResidence Unit, St. Francis Square, Victoria, Gozo. A residence document valid for a period of 10 years will be issued and will be automatically renewed on application, provided that the relevant conditions remain satisfied. The existing document shall continue to remain valid until the new residence document is issued. UK nationals who settled in Malta just before the end of the transition period may apply for their new residence status after 3 months of their arrival in Malta and before 30th June 2021.
Netherlands	British citizens and their eligible family members should apply for a new Article 50 permit before 30 June 2021. Applicants are reminded to make an appointment to have their biometrics taken at an IND desk (photo, passport and signature). The IND needs the biometrics to prepare the residence document. Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit plus evidence of submitted new permit application once filed. Cross-border workers with an established status before the end of the transition period on local contract and Dutch registration number must apply for a Frontier worker status document at the earliest. Individuals on foreign employment contracts may still be eligible for a Frontier worker document provided they can evidence they are not a posted worker and their activities are long lasting. Holders of frontier workers document would be limited to a stay of 90 days in a 180 days period in line with Schengen regulations for non- EU nationals.
Norway	UK citizens can apply for a new permit under the Withdrawal Agreement until 31 December 2021. To be eligible they must be on a local contract with the Norwegian entity which started before 31 December 2020. Cross border workers on local contracts can also apply for this permit. UK nationals posted to Norway are work permit-exempt for up to three months and may stay longer if posted under free movement of services or if their work contributes to establishing a Norwegian business. Any other category of posted workers (including EU nationals on a UK contract) require a non-EU residence permit and have no permission to work until their new permit with work authorization is issued.



Country	Application process for UK citizens
Poland	<p>UK citizen and their eligible family members can apply for a new residence permit document (Article 50 permit) at the voivodship office. Applications must be filed before 31 December 2021. UK citizens who have resided in Poland for at least 5 years before or after the end of Brexit transition period are entitled to permanent residence. Those with less than 5 years of residence are entitled to Article 50 permit. Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit plus evidence of submitted new permit application once filed. UK citizens without the Article 50 permit or evidence of filing may face travel restrictions. Cross-border workers with established status before 31 December 2020 and an employment contract from a foreign company that has a Polish work address can apply for a Frontier worker Permit. Cross border workers with an assignment letter from a foreign entity which lists a Polish work address qualify as posted workers but not for the Frontier Worker permit and will have to apply for a special residence permit for posted workers.</p>
Portugal	<p>Current EU registration documents will be exchanged for a new residence permit. British citizens living in Portugal should have obtained the “European Citizenship Certificate” before 31st December 2020. This is the official residency document in Portugal for all EU citizens to ensure a smooth transition to the Brexit procedures. Application system for the new Article 50 permit is now open and applications from British citizens and their eligible family members must be filed before 30 June 2021. Until the new permit is issued, individuals can evidence their status by providing evidence of digital confirmation of filing for the new permit. Cross-border workers with an established status before 31 December 2020 will be able to apply to register as a frontier worker to be able to continue their activities once the application system opens. For the time being, it is recommended that cross border workers carry all documentation relevant to their activities in Portugal along with a valid health insurance.</p>
Romania	<p>EU citizens and their eligible family members can now apply for the new residence status under the Withdrawal Agreement before 31 December 2021. Until they obtain their new Article 50 residence permit, they can continue to enter Romania without a visa, with a valid registration document issued by the General Inspectorate for Immigration. These registration documents will be recognized until 31 December 2021. No information for arrangement for cross border workers have been published yet.</p>
Slovakia	<p>British citizens and their eligible family members need to contact the Foreigners Police to obtain a new Five-Year Residence Permit Card before 30 June 2021. Those who have lived in Slovakia for at least 5 years will receive a Long Term Residence Permit , for indefinite period. Applications are open and must be submitted in person. Cross-border workers should also register their residence and obtain their respective Residence Card. Until the new permit is issued, individuals can evidence their status with their EU Residence Registration or their family member permit. Slovak company employing British nationals who have started working before 31 December 2020 has notification duties towards respective Labour Office which must be completed before 13 January 2021.</p>

Country	Application process for UK citizens
Slovenia	<p>Applications for Article 50 permits are open and must be submitted by 31 December 2021 or before the expiry of the current EU registration certificate, whichever is sooner. UK citizens without an EU permit must apply for an Article 50 permit within 90 days of entry. Applications must be filed in person at an Administrative Unit (Upravne Enote). Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit plus evidence of submitted new permit application once filed. Cross-border workers with an established status before 31 December 2020 and on local employment contract would be able to continue their activities. They should contact Administrative Unit for information to obtain details on applicable process.</p>
Spain	<p>British citizens and their family members residing in Spain can now request a uniform format residence document (TIE), which will prove the condition of their beneficiary carrier of the rights contemplated in the Withdrawal Agreement. Those who hold an EU certificate of registration can exchange it for a new document at relevant police station. Those without a residence document should apply at the Immigration Office online or in person. Upon receiving preliminary approval from the Immigration office, they can apply for the new residence card (TIE) at the police station. There is no deadline to replace the EU certificate of registration for the Residence document, but all individuals are advised to apply at the earliest. Those who have started residing in Spain just before 31 December 2020 are advised to apply within 90 days of arrival.</p> <p>Until the new permit is issued, individuals can evidence their status with their EU registration certificate or family member residence permit or evidence of submitted new permit application once filed. There are no arrangements in place for UK cross-border workers therefore these individuals will need work authorization in order to work in Spain. UK workers posted in Spain before 31 December 2020 can keep providing their services in Spain during the validity of their status. They will be required to apply for a residence document/card.</p>
Sweden	<p>British citizens currently residing in Sweden will need to apply to the Swedish Migration Agency for a new residence status. The application system is open and applications should be filed before 30 September 2021. The deadline for applications of their eligible non -EEA family members has not been confirmed yet, but they must apply for residence permit within 3 months of arrival. Until the new permit is issued, individuals can evidence their status with tax identification number or family member residence permit. Cross-border workers who are employed in Sweden, but live elsewhere need a certificate and card.</p>
Switzerland	<p>As Switzerland is not a member state of the European Union, Switzerland and the UK have established their own bilateral agreement regarding their respective citizens' rights. UK citizens residing in Switzerland with a valid residence permit (i.e., holders of a short-stay, residence, cross-border commuter permit, or permanent residence) obtained under the Agreement on the Free Movement of Persons (AFMP) before 31 December 2020, generally do not need to take any action. However, they may be requested to exchange their current permit for a new one in due time. No details of this has been published. UK nationals can continue to use the notification procedure for posted worker activities for up to 90 days, including for postings starting after 1 January 2021.</p>

- **Those arriving from 1st January 2021.**

Will be treated as non – EU citizen and will be required to meet regulations of respective countries in order to work in EU. The Free Trade Agreement provides terms of the UK – EU cooperation following the end of the Brexit transition period. However the real impact will depend on how each EU Member State adheres to the Agreement in their national rules.



## UK and Ireland

Rights of UK citizens in Ireland and Irish citizens in the UK will remain unchanged and there will be no obligation to apply for a residence document or a visa. Non-Irish or non-British family members are required to apply for suitable permission residence permit or visa.

### Business travellers from 1 January 2021

- **UK citizens in Europe:** Business visitors will be limited to maximum 90 days in any 180-day period to perform certain permitted activities. The Free Trade Agreement lists them, but they may vary in national legislations of each EU country.
- **EU, EEA and Swiss citizens in the UK:** As under the standard terms contained in the Free Trade Agreement business visitors will be subject to stays of 90 days in a 180-day period. However local law provisions permitting longer stays for business trips will remain unless and until changed. The local provisions allow business visitors to come to the UK for up to 180 days at any one time. They will only be allowed to undertake activities permitted by business visitors. Visitors are prohibited from using the visitor route to reside in the UK long term.

This article was authored by Andrea Fascetti, Global Director Immigration Services. If you have questions regarding this article or would like to find out more about our other services, please contact Andrea Fascetti at [afascetti@crownew.com](mailto:afascetti@crownew.com) and Joanna Sogeke, Senior Immigration Coordinator EMEA at [jsogeke@crownew.com](mailto:jsogeke@crownew.com) or visit our website at [www.crownworldmobility.com](http://www.crownworldmobility.com).



Andrea Fascetti



Joanna Sogeke

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