

Brexit and UK nationals in the EU

Phase 1 - Now to 31 January 2020

Deal

UK nationals can continue to travel and work in the EU in the same way as previously.

No Deal

UK nationals resident in an EU country now can apply to register under the current system before any UK exit date, in order to try and protect their position in a no-deal scenario.

Typically, for a UK national working in another EU member state, an application for a Registration Certificate or equivalent is made with documents such as a passport, contract/certificate of employment, proof of accommodation and recent payslips.

Phase 2 - Transition / Grace Period

Deal

All the EU member states would be bound by the Withdrawal Agreement. As a result, UK nationals exercising a right of residence in a member state by the end of the agreed transition period, such as 31 December 2020, will be able to apply to stay long term in the host country.

No Deal

For UK nationals already resident in the member state before the exit date, most EU countries plan to have a transition period where they can continue to live and work in the member state. Current transition/grace periods for key EU member states are:

- Belgium, Czech Republic, Greece, Italy, Poland & Portugal** - To 31 December 2020
- France** - 12-month grace period but must apply for a residence card within 6 months of the exit date (on-line form available)
- Germany** - 3 months but is likely to be extended to a total of 9 months
- Luxembourg** - 12-month grace period but must apply for a residence permit within 9 months of the exit date
- Austria** - 6 months
- Denmark** - Not specified
- Netherlands** - 15 months
- Spain** - 21 months
- Sweden** - 12 months

For UK nationals not resident in the member state before the exit date they would be treated as third country (non-EU) nationals and require a work permit to work. To visit they would need at least 6 months validity on their passport (from date of arrival in the EU) and spend no more than 90 days in any 180-day period in the Schengen area. They may also be asked to show sufficient funds, a return ticket, proof of accommodation and health insurance.

Phase 3 - After Transition Period

Deal

UK nationals arriving in a member state after the transition period are most likely to be subject to local immigration requirements such as needing to apply for a work permit.

No Deal

To stay long term, UK nationals will need to apply for a new status. This status is likely to be based on either the existing third country national (non-EU) rules or a completely new status.

Member states have generally not yet decided on their future rules but the majority show an intention for UK nationals to be able to apply for a temporary or permanent residence permit to allow them to stay and work beyond the end of the transition period.

