

IMMIGRATION UPDATES FROM HARBOTTLE & LEWIS LLP

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2025 is yet another year whereby various significant changes are being made to the UK immigration system. Below we have focused on the changes that may be more relevant to the business, particularly in relation to sponsoring an individual to work within the creative sector in the UK and which are due to be implemented within the Immigration Rules as of **22 July 2025**.

The headline change is again an increase in the minimum salary threshold for Skilled Worker visas, rising from £38,700 to £41,700 per annum and the removal of occupation codes from RQF Level 3 – 5 from the Appendix Skilled Occupation List, a further explanation is provided below.

If you would like to rely on the current requirements and salary thresholds under the Skilled Worker visa, you must assign a CoS prior to 6pm on 21 July 2025. The Sponsor Management System (SMS) will temporarily be unavailable post 21 July 2025 at 6pm.

Skilled worker minimum salary threshold reforms

The general salary threshold for those that are applying for leave to enter the UK as a Skilled Worker or for Leave to Remain in the UK have increased, (including those where an exception applies such as: the role being on the Immigration Salary list, the individual is under 26, studying, a recent graduate/in professional training, the individual has a PhD in a STEM subject relevant to the role or they have a postdoctoral position in science or higher education) or the going rate for the relevant occupation, whichever is higher. Please see a summary of the difference in threshold pre-22 July 2025 to present:

Salary option	Who applies to	Old general threshold 4 April 2024 – 22 July 2025	New general threshold post 22 July 2025
Option A	'standard' threshold for new applicants	£38,700	£41,700
Option B	New applicants – PhD in a relevant non-STEM subject	£34,830	£37,500
Option C-E	New applicants – PhD in a relevant STEM subject, immigration Salary List or New Entrant	£30,960	£33,400
Option F	Applicants that hold leave prior to 4 April 2024	£29,000	£31,300

Changes to Skilled threshold

In addition to changes to the minimum salary threshold, there have been many changes to the occupation codes listed within the Appendix Skilled Occupations List. Approximately 180 occupation codes will be removed from the list, in particular this will relate to roles that are considered to be RQF Level 3-5. Moving forward, roles that are at RQF Level 6 or above will be sponsored only. There is a transitional provision in relation to sponsoring roles that are lower than RQF Level 6 which will only be available temporarily.

[The Immigration Salary List](#) will remain temporarily until **31 December 2026**, this list provides a list of jobs where a reduced salary threshold applies to a Skilled Worker's visa application and include roles at RQF Level 3-5. In addition to this list, the Home Office have implemented a new '**Temporary Shortage List**' which will also include roles that are RQF Level 3-5. This list is said to also be available until **31 December 2026**, however, it will remain under constant review and should the Home Office foresee a role no longer to be required, it can be removed at any time. This list is not covered under a reduced salary threshold and therefore individuals will be required to meet the minimum salary threshold under option A (unless an exception applies) or the going rate for the relevant occupation, whichever is higher.

The codes that you most commonly may have used, and which remain temporarily until **31 December 2026**, please see below:

Immigration Salary List

SOC 2020 occupation code and any further criteria	Included on the Immigration Salary List in:				Removal date
	England	Scotland	Wales	Northern Ireland	
					2026
3414 Dancers and choreographers – only skilled classical ballet dancers or skilled contemporary dancers who meet the standard required by internationally recognised UK ballet or contemporary dance companies. The company must be endorsed as being internationally recognised by a UK industry body such as the Arts Councils (of England, Scotland or Wales).	Yes	Yes	Yes	Yes	31 December 2026
3415 Musicians – only skilled orchestral musicians who are leaders, principals, sub-principals or numbered string positions, and who meet the standard required by internationally recognised UK orchestras. The orchestra must be a full member of the Association of British Orchestras.	Yes	Yes	Yes	Yes	31 December 2026
3416 Arts officers, producers and directors – all jobs	Yes	Yes	Yes	Yes	31 December 2026

Please note that Musicians also fall under RQF Level 6 and so should continue to be able to be sponsored post 31 December 2026.

Temporary Shortage List

- 3412 Authors, writers and translators
- 3414 Dancers and choreographers

You will note that 3414 Dancers and Choreographers are included on both lists and therefore we are seeking further clarification from the policy team at the Home Office in this regard.

3413 Actors, entertainers and presenters

Please note that as of 22 July 2025, if you intend to sponsor an Actor under the above occupation code, you can no longer sponsor individuals in this route. Individuals can only be sponsored in this route if they have leave as a Skilled Worker prior to 22 July 2025.

3413 Actors, entertainers and presenters	<ul style="list-style-type: none"> • Actors • Broadcasters, podcasters and presenters • Children's entertainers • Comedians • Disc jockeys • Magicians • Models • Singers • Social media influencers • Actors, entertainers and presenters not elsewhere classified 	£33,400 (£17.13 per hour)	Not applicable	Not applicable	£33,400 (£17.13 per hour)	No
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The above table only applies to those that are already in the UK pre-22 July 2025.

Please also see the minimum salary thresholds for each code below in relation to those that are listed above on the Immigration Salary List and Temporary Shortage List, which have increased:

SOC 2020 occupation code	Examples of related job titles (non-exclusive)	Going rate (SW – options A and D)	90% of going rate (SW – option B)	80% of going rate (SW – option C)	70% of going rate (SW – option E)	Eligible for PhD points (SW)?
3412 Authors, writers and translators	<ul style="list-style-type: none"> • Authors • Bloggers • Copywriters • Literary editors • Poets • Script writers • Technical writers (excludes computing) • Translators and interpreters • Authors, writers and translators not elsewhere classified 	£36,100 (£18.51 per hour)	Not applicable	Not applicable	£33,400 (£17.13 per hour)	No
3414 Dancers and choreographers	<ul style="list-style-type: none"> • Choreographers • Dance teachers (excludes educational establishments) • Dancers 	£33,400 (£17.13 per hour)	Not applicable	Not applicable	£33,400 (£17.13 per hour)	No

3415 Musicians	<ul style="list-style-type: none"> • Composers and musical arrangers • Music conductors • Instrumentalists • Musicians not elsewhere classified 	£37,500 (£19.23 per hour)	Not applicable	Not applicable	£33,400 (£17.13 per hour)	No
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As mentioned above, there are transitional arrangements for individuals that are already in the UK with leave as a Skilled Worker or who have applied to this route with a CoS before 22 July 2025. Those that are in an occupation code that no longer forms part of the new RQF Level 6 Occupation List but are performing roles that are in RQF Level 3-5 can remain in the UK with the same employer, switch or change employers. There are however certain roles that are RQF Level 3-5 whereby the individual must continue to work for the same sponsor only to continue to be eligible to extend their leave.

Dependants

Those that are being sponsored within an RQF Level 3-5 role will not be able to bring their dependant partner or child to the UK, however, if the individual is already in the UK with permission as a Skilled Worker within RQF Level 3-5 roles, they can continue to extend their dependants leave or apply for Indefinite Leave to Remain. There are some exceptions that apply to children.

Supplementary employment

Individuals granted permission as a Skilled Worker under the Rules in place before 22 July 2025 can rely on supplementary employment within roles listed as RQF Level 3-6. This enables existing Skilled Workers to take supplementary employment below RQF level 6. Those obtaining Skilled Worker visa's post 22 July 2025 will only be able to carry out supplementary employment in RQF Level 6 or above.

Creative Worker visa/Concession route

As mentioned above, no changes are being made to these routes.

CoS allocations and Sponsor Management System (SMS)

As you are aware if you require a CoS to sponsor an individual because either the individual is applying from within the UK or under the Creative Worker route, you must ensure that you have a number of CoS' allocated to the SMS, prior to being able to proceed to assign a CoS.

CoS allocations will remain on the licence for a year. Each year, either the CoS allocation will be automatically renewed to the number of allocations you used within the previous year or alternatively you will be required to submit a request to the Home Office to increase your CoS allocation for the following year. Alternatively, you may have used all the CoS' allocated on the SMS and intend to sponsor further individuals and therefore require a request for a further allocation within the year.

The Home Office have become extremely rigorous with the number of CoS' that they allocate to each company, whether it's for a Creative Worker visa or for a Skilled Worker visa. The Home Office will no longer issue more than the amounts that were used in the previous year.

When you are required to submit a manual request to the Home Office for a further allocation, it is advised to provide as much detail as possible as to the need for the allocation. It has become increasingly common that the Home Office may ask for further information once a

request has been included, such as, a detailed description of the role, the detail the individual of individual that you intend to obtain a CoS for, copies of contracts, payroll and business bank statements. The Home Office have been carrying out frequent compliance audits checks, more than they used to, this is now the new norm.

Where possible, it would be advised to apply for a CoS allocation at the earliest where you may anticipate that you have a prospective individual that will require a visa. Priority service is available to purchase at an additional cost of £200, this will reduce the processing time of the request for a CoS allocation to 5 working days, however, it can be difficult obtaining a priority slot and you are required to apply at 7am each day and only 60 priority slots are available each day.

Whilst the priority service can be used, please note that if the Home Office would like to request further information as per stated above, they can take the allocation request out of the priority service time and this can cause delay, a refund on the priority fee will also not be received.

Electronic Travel Authorisation (ETA)

ETA has now been implemented for all non-visa nationals including EEA nationals.

An ETA is a new requirement for individuals who would usually enter the UK without requiring a visit visa i.e. non - visa nationals. A non-visa national is someone who doesn't usually need a visa to visit the UK, provided their visit is for less than 6 months and the purpose of that visit falls within the activities permissible under the visitor rules.

The ETA will give the individual permission to travel to the UK and it will be electronically linked to the passport, if the individual who requires an ETA travels to the UK without one, they could be refused entry at border.

Individuals will require an ETA if they intend to:

- Come to the UK for up to 6 months for tourism, visiting family/friends, business or short-term study.
- Come to the UK for up to 3 months on the **Creative Worker visa concession**; and
- Transit through the UK, including if the individual is not going through the UK border control.

The ETA is applied using an app, and the individual will be required to complete a set of 'suitability' questions. A decision is usually received within 3 working days, subject to any further information being required. The ETA will be valid for 2 years and can also be used for multiple visits.

If you have individuals that work overseas and require them to enter the UK on a business visit, they will need to apply for an ETA. This could cause a delay in their visit and it is therefore important to ensure that you keep up to date in relation to the opening of this route. In addition, the UK will be insisting that [all connecting \(transiting\) travellers must obtain an ETA](#).

Please note that an individual does not require an ETA if they have either:

- An existing valid UK visa
- permission to live, work or study in the UK.
- a British or Irish passport

If an individual's ETA application is refused they will need to [apply for a visa](#) if they wish to seek permission come to the UK.

On arrival to the UK, The UK Border Force will check the ETA and ask supplementary questions before deciding whether or not to allow the traveller in. The government says: "An ETA does not guarantee entry to the UK."

Physical immigration documents phased out.

Physical documents such as Biometric Residence Permits (BRPs), Biometric Residence Cards (BRCs) and other paper-based documents are now invalid – holders must have a UKVI account to prove their status online and to enable them to travel in to and out of the UK.

It would be advised to carry out an audit on your employees' files in relation to their Right to Work check documents to ensure that where possible and required, an online check has been carried out. It is important to ensure that you are compliant with your Right to Work checks to prevent any civil penalty.

Vignette document phase out

As of 15 July 2025, The UK is phasing out visa vignettes (physical stickers in passports) for main applicants of certain visa types such as, Skilled Worker, Student visas and Global Talent visas. Instead, these individuals will receive an eVisa, which is a digital immigration status. Similarly to the above, these individuals will be required to create a UKVI account to access their eVisa before travelling to the UK.

Further proposed Changes

Further changes to the Immigration Rules are planned to take place later this year. We are still awaiting further confirmation as to the requirements of the changes that are due to take place, however, to briefly summarise the proposed changes, please see below:

- Immigration Skills Charge – This charge is set to increase by 32% i.e. from £364 per year for small business to approximately £480 and from £1,000 for large companies to approximately £1,320.
- Earned Settlement and Citizenship – The Government is proposing to extend the eligibility to settlement from five years to ten years for work routes, exemptions may apply to those that are able to demonstrate contributions to the UK economy.
- Study routes and Graduate routes – Reforms are set to tighten the Student and Graduate routes to ensure that the routes are not for settling in the UK. Reforms to the graduate route are under review however the route will reduce those on the Graduate route from being able to be in the UK for 2 years to 18 months and further restrictions may apply.

Please note that the information that has been provided above is up to date as of 21 July 2025, however, the information should be used for guidance purposes only. Should you have any specific enquiries, please do reach out to Harbottle & Lewis LLP directly.