



Your guide to the UK's  
immigration White Paper:

**A comprehensive overview of policy  
shifts and employer considerations**

# Introduction and contents

The UK Government published their immigration White Paper on 12 May 2025. The White Paper is a statement of intent, setting out how the government intends to fundamentally change the immigration system to reduce net migration numbers and push employers to do more to attract, recruit, and train domestic workers.

The paper itself is concerned with work, student, and family migration. It has been drafted in strong terms and promises to substantially tighten and enforce the rules and better enable integration. We have drafted this guide to help employers absorb and plan for the changes that are coming to work migration and permanent residence. It will help you to understand what is coming, when you could expect the changes to happen, what to say, and what you can do now and in the future. The guide itself is not concerned with family or student migration, but those changes do matter too and we would be happy to have a broader conversation, where helpful.

Here is how we hope the guide will help you respond to and plan for the policy changes:

The need	Page number	Our content
Quickly, what do I need to know?	<a href="#">2</a>	If you only read one page
What detail has been provided?	<a href="#">3</a>	The detail: Known knowns and known unknowns
What about the niche global talent categories?	<a href="#">7</a>	Plans to expand Global Talent categories
What should I tell people?	<a href="#">8</a>	Your message to the business and to your colleagues—draft suggested emails
What should I do?	<a href="#">10</a>	Your plan—Workforce planning
	<a href="#">12</a>	Your plan—Sponsorship and visa applications
	<a href="#">13</a>	Your plan—Earned Settlement and Earned Citizenship



## If you only read one page

We want our guide to be as helpful as possible, and that means we are sending you a lot of information. Here are the headlines, if you only have time to read one page.



- In future, fewer jobs will qualify for sponsorship because:
  - The Home Office is increasing the skill level for a Skilled Worker visa to degree level
  - Some mid-level jobs will still qualify for a period of time, but only where they are included on a new Temporary Shortage Occupation List (TSOL)



- The minimum salaries for sponsored workers will increase, although the new level has not been determined



- In future the Graduate Visa will only be valid for 18 months



- The cost of sponsorship will increase due to a 32% increase to the Immigration Skills Charge (ISC), taking it to £1,320 per year



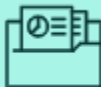
- English language requirements will increase for Skilled Workers and certain other categories and will be introduced for dependants



- It will take ten years for Skilled Workers and many other visa holders to qualify for Indefinite Leave to Remain (ILR), although it will be possible to accelerate the journey



- The journey to citizenship will be similarly reformed



- The government has not decided whether it will apply these stricter ILR and citizenship rules to people already in the UK

# The detail: Known knowns and known unknowns

The White Paper is 76 pages long but does not contain a great deal of detail and leaves many questions unanswered. In this part of the guide we set out the headlines, what is known, and what is not known.

The headline	Known knowns	Known unknowns and assumptions
Workforce planning		
<b>The minimum skills threshold for sponsored visas will rise from RQF3 (school leaver) to RQF6 (degree level), other than where there is strong evidence of skills shortage</b>	<ul style="list-style-type: none"> <li>For a period of time, all degree level roles will qualify for a work visa.</li> <li>But, there may come a time when some degree level jobs do not—that will be dependent on whether employers and sector groups can demonstrate they are trying to recruit local workers.</li> <li>For key sectors, that will mean producing or updating and then delivering a workforce strategy.</li> <li>180 jobs, all below degree level, will no longer automatically qualify for sponsorship.</li> <li>But, a new TSOL will be created containing mid-skill level roles/ skills that have been in long term shortage, where the industry can demonstrate that they are committed to increasing domestic recruitment. Jobs will be included on the TSOL for a finite period of time.</li> <li>The independent Migration Advisory Committee will compile that list.</li> </ul>	<ul style="list-style-type: none"> <li>Which degree level jobs could be struck off the list. There has been talk of engineering and tech jobs, but there should be plenty of opportunity for employers to demonstrate the efforts they are making to recruit locally. The Migration Advisory Committee's report on immigration in the tech and engineering sector is due to be published soon and should inform that conversation.</li> <li>Which jobs will be on the TSOL or when and how employers can argue for jobs to be included. We expect that the usual MAC process will apply. That would mean a short period of consultation and engagement with sector bodies and employers.</li> <li>How temporary the TSOL will be, i.e. how long jobs will stay on there for.</li> <li>Whether there will be a restriction on how long people can stay for, where they are working in a job on the TSOL.</li> </ul>

<b>Salaries will increase</b>	The White Paper says 'salary thresholds will increase'.	It does not say: <ul style="list-style-type: none"> <li>• If minimum salaries will increase across = particular visas or particular jobs</li> <li>• Whether it will apply to all jobs</li> <li>• How high salaries will rise</li> </ul>
<b>Graduate recruitment</b>	<p>The White Paper does not specifically address graduate recruitment or university 'milkround' programmes, although some of the policy changes will apply irrespective of how employees are hired.</p> <p>The White Paper does commit to reduce the length of a Graduate visa to 18 months.</p>	
<b>Sponsorship</b>		
<b>The Immigration Skills Charge</b>	The ISC will increase by 32% to £1,320 per year.	Whether the increase will apply only to new applicants after the change or to those who arrived earlier and are extending their visa. We can assume that it will apply equally to all.
<b>Visa application</b>		
<b>English language</b>	<p>The English language requirement for Skilled Workers will increase to RQF level B2 (known as independent user). This change will also apply to applications for ILR and other categories that currently have the English language requirement.</p> <p>English language requirements will not be applied to intra-corporate transferees applying for Global Business Mobility (GBM) visas.</p>	

	<p>Adult dependants will need to speak A1 (basic user) level English when they apply for a visa. This will increase to A2 (also basic user) level when they extend their visa and B2 when they apply for ILR.</p>	<p>Whether this will extend to dependants of GBM visa holders; the White Paper says this change will apply to all dependants of workers, so it appears it will extend to them.</p>
Staying permanently		
<b>Earned Settlement</b>	<p>The standard qualifying period for ILR will increase from five to ten years for Skilled Workers. This will also apply to other visa categories but will not apply to dependants of UK nationals and people settled here.</p> <p>Through the expansion of the Point-Based System, individuals will also have the opportunity to reduce the qualifying period based on Points-Based contributions to the UK economy and society.</p> <p>The Home Office will consult on these changes later this year.</p>	<p>The Home Secretary has told Parliament that the consultation will also consider whether to apply the extended qualifying period to people already in the UK. We hope that Home Office lawyers and Ministers appreciate that policies retrospectively applied to people already in the UK tend to be overturned in court.</p> <p>We do not know what criteria for access to ILR after five years will be proposed in the consultation. Compliance with immigration rules, a clean criminal record, paying taxes, contributions to the community and/or working a strategically important job have been suggested.</p>
<b>Earned citizenship</b>	<p>The journey to citizenship will be reformed in accordance with the journey to ILR.</p>	<p>The White Paper does not say what this would look like or how long people will need to have held ILR for.</p>
<b>Knowledge of Life in the UK test</b>	<p>The KOL test will be refreshed.</p>	<p>The White Paper does not say how the test will change.</p>



## Plans to expand Global Talent categories

The government has sought to offset the impact of changes to the main work immigration categories by promising to make it easier for global talent to come to the UK. We have set out their commitments in full below, but should be placed in its proper context.

The Global Talent, Innovator Founder and High Potential Individual visa categories all serve a purpose for UK companies, enabling incredibly talented people to come to the UK without a job offer and make the most of their talents. But they are not well suited to the day-to-day recruitment and workforce planning of UK employers. They operate against highly selective and variously complicated or subjective frameworks that tend to take longer than a regular visa. They can also be less certain than the well established and understood tick box requirements of sponsorship.

There are occasions when we recommend these visas to our clients and those instances may increase in light of the White Paper. But we do not expect vastly increased takeup or strategic use of these categories.

### The White Paper promises:

**As part of our mission to promote growth, we will go further in ensuring that the very highly skilled have opportunities to come to the UK and access our targeted routes for the brightest and best global talent by:**

- Increasing the number of people arriving on our very high talent routes, alongside faster routes for bringing people to the UK who have the right skills and experience to supercharge UK growth in strategic industries
- As part of that, increasing places to our scheme for research interns, including those working in the field of Artificial Intelligence, to allow businesses access to additional promising young talent
- Make it simpler and easier for top scientific and design talent to use our Global Talent visa
- Review our Innovator Founder visa to ensure that it supports entrepreneurial talent currently studying at UK universities to move into the visa so that they can build their business and career in the UK
- Double the number of workers that an overseas business can send to the UK with the aim of establishing a presence in the UK
- We will explore a targeted and capped expansion of the HPI route, looking to double the number of qualifying institutions, whilst maintaining the focus of the route on individuals that will have the most benefit to the UK workforce and ensuring that any necessary safeguards are in place

## Your message to the business—a draft email

There is only so much you can do today to prepare for the new policies (more on which follows) but at the very least you will want to ensure your colleagues understand what is proposed. We hope this draft email is a good start for your internal communications to colleagues.

From:

To:

Cc:

Title: **UK immigration White Paper**

Dear

On 12 May the UK government published a White Paper on immigration. Their intention is to reduce overall net migration by creating an expectation that employers do more to hire and train local workers, placing more of an emphasis on integration and also increasing costs. The key policies impacting our business are:

- The minimum skills threshold for sponsored visas will rise from RQF3 (school leaver) to RQF6 (degree level), other than where there is strong evidence of skills shortage. A list of acceptable lower skill jobs will be created and it seems probable that we will have an opportunity to advocate for particular roles, if needed. It is too early to say when or how that process will operate but it will probably involve a period of consultation.
- The minimum salary for sponsoring a worker will increase from £38,700 or the going rate for the job. There is no indication of how high the minimum salary will increase.
- The cost of sponsorship will increase by £320 per year.
- Sponsored Skilled Workers and other visa holders will need to spend ten years in the UK before applying for Indefinite Leave to Remain, up from five years at present. It will be possible to accelerate that process where, for instance, the applicant has paid taxes, contributed to their local community, or worked in a strategically important job. The Home Office will consult on this policy.
- Other changes include a shortening of the Graduate Visa, higher English language expectations for workers, and new English language expectations for family members.
- Some of the changes may come in around September or October 2025 while others are anticipated over the course of this Parliament, so before July 2029.
- The White Paper only contains high level policy so it is not yet possible to fully assess the impact or begin full preparation. In the meantime, we are ready to answer questions from employees and will take any opportunity to speak directly to the UK authorities.

Kind regards,



## Your message to colleagues—a draft email

You may have already received questions or concerns from colleagues who are hoping to apply for ILR or citizenship in the near future. Later in this guide we set out the different ways you could communicate with or support people that are worried about the new rules. Right now, you may simply want to distribute a message that is as reassuring as possible. Here is a proposed draft to get you started.

From:

To:

Cc:

Title: **UK immigration White Paper, Indefinite Leave to Remain, and citizenship**

Dear

On 12 May the UK government published a White Paper on immigration that included a plan to change the time frame and requirements for applications for Indefinite Leave to Remain (ILR) and citizenship. We appreciate that the announcement has been a cause for concern to some of our employees.

The Home Office intends to extend the qualifying period for Indefinite Leave to Remain (ILR) from five to ten years for people holding Skilled Worker and several other visas. There will be an opportunity for some people to apply for ILR after five years where they score sufficient points in a new framework that has not yet been released. The government will consult on that framework and the Home Office.

It is not yet clear whether these new rules will apply to people already in the UK, in addition to those who enter in future. The Home Secretary has told Parliament that the government will consider this retrospective treatment as part of their consultation.

You may have questions about what this means for you and how and when you will be able to apply for ILR. Our immigration advisors, Vialto Partners, have produced a guide about ILR that should help you understand the requirements and process. You can find it [here](#). Vialto has also shared a [guide](#) on applications for citizenship, which is available to qualifying people who hold ILR.

Kind regards,



# Your plan—Workforce planning

## The challenge

Do you sponsor workers who will fill jobs below degree level? In future it will only be possible to continue with sponsorship if their role is on the TSOL.

## How quickly could this happen

Probably not before October 2025 or April 2026 because it will take time to create the TSOL.

## The plan

# 01

### Establish whether it is a problem



You can find the jobs below degree level by [reviewing SOC codes](#) which start with 4 or higher



You may immediately know which jobs at-risk you currently sponsor.



If not, get in touch and Vialto can scrape your data.

# 02

### Advise the business



Which jobs are at risk?



Do you have a work force plan to recruit and train domestic workers or do you need to establish one?

# 03

## Engage your sector body



Do you know who they are and do you have a relationship?



It is probably too early to start providing information and evidence but they may already know what they will need you to collect.

# 04

## You aren't alone



If you get stuck, get in touch. We can help point you in the right direction.



# Your plan—Sponsorship and visa applications

## The challenge

The 32% increase to the ISC will mean that cost of sponsorship in the Skilled Worker and GBM categories will increase by £320 per year of sponsorship. Only EU and EEA nationals with GBM visas will be exempt, as the ISC does not apply to them.

New visa applicants will need to pass a moderately more difficult English language test. This can be included in your current processes and shouldn't be an issue, so long as the applicant passes the test. Skilled Worker applicants extending their stay will also need to pass the more difficult test. They probably won't be expecting the new requirement and should be advised to take the test sooner rather than later.

Dependants will also need to pass English language tests. Again, that can be included in existing processes for new entrants but early comms would be sensible for people already in the UK.

## How quickly could this happen

In theory quite quickly. Neither change needs consultation and both require changes to secondary legislation, which normally means a 21 or 40 day lead in time from the point law is laid in Parliament. The Government has not said when new law will be laid so it may not be imminent, but an early response would be sensible, time permitting.

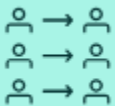
## The plan



The change to the ISC will push up costs. We can help you establish the likely aggregate increase, if needed.



Vialto will amend English language requirements in our advice to visa applicants, where we support the process for main applicants and or dependants. Where we do not, you should ensure that they are briefed.



People already in the UK should be told that this is coming. Please get in touch if you would like help identifying the employees or developing the messaging.



# The plan—Earned Settlement and Earned Citizenship

## The challenge

Many employees are already asking what the change will mean for them. There is an easy but uncertain response to the question—nobody knows because the Home Office hasn't decided—but more can be done.

## How quickly could this happen

Not quickly. The Home Office would need to consult on policy and amend primary legislation before they can change citizenship rules and that could all take years. Changes to the rules for ILR would be made in secondary legislation and that could happen quickly, but only after the consultation so we are probably still looking at at least a year before anything changes.

## The plan



**Educate and reassure employees, advise them to apply sooner rather than later where eligible**

---

### Your line to take

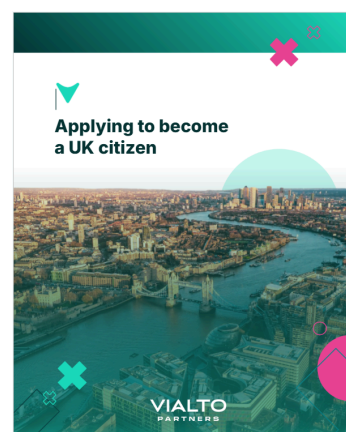
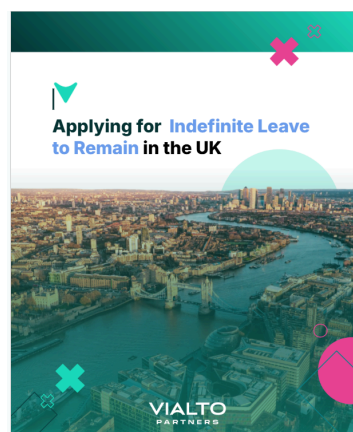


- The Home Office has said that it will take ten years to reach ILR in future, but they haven't said whether it will apply to people already in the UK.
- It will probably be several years before the change happens so the new rules for ILR may not apply to you.
- Apply now if you can, seek help if you aren't sure



### Helping employees

You may be faced with lots of questions about how employees can apply for [ILR](#) and [citizenship](#). These short briefings could help and can be shared with your employee.



## Going the extra mile

If you are getting lots of questions you may want to do more to reassure and educate employees. You could consider:

- Direct email communication to potentially impacted employees, setting out what is known and containing links to the ILR and citizenship briefing sheets provided in this guide, along with other resources available to our clients
- Townhall briefings for impacted employees. The townhalls won't be able to answer every question, but should dispel any unfounded concerns
- 1:1 consultations for potentially impacted employees
- Support with ILR and citizenship applications

Any communications should also cover the changes to English language for main applicants and dependents.

**We can help with all of this.**



**Ian Robinson**

[ian.j.robinson@vialto.com](mailto:ian.j.robinson@vialto.com)



**Lyudmyla Davies,**

[lyudmyla.davies@vialto.com](mailto:lyudmyla.davies@vialto.com)



**Tom Marsom**

[tom.marsom@vialto.com](mailto:tom.marsom@vialto.com)



**Andrea Als**

[andrea.als@vialto.com](mailto:andrea.als@vialto.com)







# VIALTO

## PARTNERS

Vialto Partners ("Vialto") refers to wholly owned subsidiaries of CD&R Galaxy UK OpCo Limited as well as the other members of the Vialto Partners global network. The information contained in this document is for general guidance on matters of interest only. Vialto is not responsible for any errors or omissions, or for the results obtained from the use of this information. All information is provided "as is", with no guarantee of completeness, accuracy, timeliness or of the results obtained from the use of this information, and without warranty of any kind, express or implied, including, but not limited to warranties of performance, merchantability and fitness for a particular purpose. In no event will Vialto, its related entities, or the agents or employees thereof be liable to you or anyone else for any decision made or action taken in reliance on the information in this document or for any consequential, special or similar damages, even if advised of the possibility of such damages. © 2025 Vialto Partners. All Rights Reserved.