



Labour migration policies
Case study series
Spain

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This case study is part of a series of summaries by PICUM of specific national labour migration and work permit policies. The full series is available on [our website](#).¹

While each case study focuses on a particular country, they are not comprehensive overviews of all the work permits available in the country. We focus on analysing the particular policies and pathways that are the most relevant across skills and sectors of employment.

We also consider, in particular, where policies include some of the essential characteristics of successful labour migration and work permit policies, as set out in PICUM's 2021 *Policy recommendations, Designing labour migration policies to promote decent work*.² This case study examines the following aspects of labour migration policy in Spain as of November 2025:

1. Labour migration system

- » Single permits for gainful employment
- » Single permits for self-employment
- » Seasonal work permits
- » Collective hiring from origin countries

2. Regularisation through the arraigo system

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1 Other case studies cover specific labour migration policies in France, New Zealand, Canada, Finland, Germany, Ireland, Poland and Portugal.
2 For the full report, please see PICUM, [Designing labour migration policies to promote decent work](#) (2021).

Section 1: Labour migration system

Spain introduced a new reform to the Regulation of its immigration law in November 2024 which entered into force in May 2025, reforming the country's legal framework for visas, work permits, settlement and family reunification. This reform also introduces new categories and procedures for regularisation mechanisms.

The Spanish government aimed to streamline administrative procedures and to clarify the responsibilities of the different competent authorities during immigration procedures³. The government also

Single permits for employment

Non-EEA nationals who wish to start working in Spain may be able to get a combined temporary residence and work permit for employed persons (single permit for employment).⁸ The initial authorisation is limited to a specific geographical area

seeks to standardise national legislation according to European frameworks⁴, including the Single Permit Directive⁵ and the Students and Researchers Directive.⁶

As the reforms are so recent, some details are still to be defined, and the case study focuses on analysis of the legal provisions compared to PICUM's recommendations and considering experiences under the system as it was previously, as we are unable to analyse the implementation of the new rules in practice yet⁷.

(autonomous community) and occupation,⁹ and is subject to an evaluation of the national employment situation, to determine whether hiring a third-country national is permissible.¹⁰ This pathway is employer-led.

3 Lucía González, [Claves de la reforma del Reglamento de Extranjería: visados, arraigo, reagrupación y permiso único desde el primer día](#), RTVE Noticias, 20 May 2025

4 Ibid

5 [Directive \(EU\) 2024/1233](#) of the European Parliament and of the Council of 24 April 2024 on a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for third-country workers legally residing in a Member State (recast)

6 [Directive \(EU\) 2016/801](#) of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for the purposes of research, studies, training, voluntary service, pupil exchange schemes or educational projects and au pairing (recast)

7 Early data on changes in permit applications and regularisations between the reform entering into force and 31 October can be seen here '[Applications to reside and work in Spain have increased by nearly 50% since the new Immigration Law Regulations came into effect](#).' Spanish Ministry of Inclusion, Social Security, and Migration, 21 November 2025

8 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Boletín Oficial del Estado, no. 280, 20 November 2024, article 72.

9 Ibid, article 73 (1).

10 Ibid, article 74 (1) a).

Eligibility requirements

For an employer to be able to request an initial single permit for a migrant worker:

- The job must meet the national employment situation criteria - either:¹¹
 - » The job must feature on the catalogue of shortage occupations,¹² or
 - » The employer must be able to show that they were unable to hire someone who already has work authorisation in Spain.¹³
- The employer must be up to date with tax and social security obligations, and must possess sufficient financial, material or human resources for the business project to fulfil the obligations stipulated in the employment contract.¹⁴ Applications may be refused if the employer has been sanctioned for infringements of legal regulations, including regarding work permits.¹⁵¹⁶
- The conditions set out in the contract must comply with Spanish labour legislation, and the collective agreement applicable to the same activity, professional category and location.¹⁷

The migrant worker can be of any nationality and must be at least 16 years old.¹⁸

Workers must be trained to carry out the activity covered by the employment contract and, where applicable, possess the professional qualifications legally required.¹⁹ They must not be within a period of commitment of non-return to Spain²⁰, and must not pose a threat to public order, public safety or public health – this will be assessed through the worker's criminal record (see more below).²¹ The worker must not be residing in Spain irregularly, but can modify an existing temporary residence permit as long as the other eligibility criteria are met,²² or they have been residing in Spain for more than a year (in which case the national employment situation is not taken into account).²³ These modification requests can be made by the permit holder or the employer.²⁴

11 In case of exceptional circumstances in the labour market, or when the national employment situation is not applicable, the General Directorate of Migration Management may order that the residence and work permit be granted in another territorial area or occupation. See [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Boletín Oficial del Estado, no. 280, 20 November 2024, article 73 (1).

12 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Boletín Oficial del Estado, no. 280, 20 November 2024, article 75 (1).

13 Ibid, article 75 (2)

14 Ibid, article 74 (1) d).

15 Ibid, article 77 (3)

16 Since the new immigration regulations came into force, there have been reports of stricter assessments of companies' financial resources during the recruitment process, which has sometimes complicated recruitment or resulted in rejections.

17 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Boletín Oficial del Estado, no. 280, 20 November 2024, article 74 (1) c).

18 Ibid, article 72.

19 Ibid, article 74 (1) f).

20 Ibid, article 74 (1) g).

21 Ibid, article 74 (1) h).

22 Ibid, article 191 (2).

23 Ibid, article 191 (4).

24 Ibid, article 191 (5).

Assessing the national employment situation

Assessing the national employment situation is a complex process involving several institutions. The catalogue of shortage occupations lists jobs classified as hard to fill per autonomous community,²⁵ using the national classification of occupations.²⁶ It is based on a quarterly assessment prepared by the State Public Employment Service, using information provided by the regional employment services and the autonomous cities of Ceuta and Melilla and, a consultation with the Tripartite Labour Commission on Migration.²⁷ There remains a significant mismatch between the reality in the labour market and the jobs that are in the catalogue.²⁸

It is also possible to hire for occupations not on the shortage occupation catalogue if the employer can show that the position cannot be filled with the workers already incorporated in the Spanish labour system.²⁹ In this case, the employer must submit a job offer to the Public Employment Service in the region where the job is located.³⁰ The job offer is available for eight days, during which the employment service serves as intermediary between the job seekers and the employer.³¹ After this period, the employer must report to the authorities who was accepted, rejected and why.³² The Public Employment Service may then issue a certificate of insufficient candidates within three days, which would allow the employer to hire a foreign worker.³³ However, it is difficult to pass this labour market test in some regions and for some occupations.

25 Ibid, article 75 (1).

26 Ibid, article 75 (1).

27 Ibid, article 75 (1).

28 See for example, the catalogue for the second part of 2025 here: <https://www.sepe.es/HomeSepe/es/empresas/informacion-para-empresas/profesiones-de-dificil-cobertura/profesiones-mas-demandadas.html>.

29 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 75 (2).

30 Ibid, article 75 (2).

31 Ibid, article 75 (2).

32 Ibid, article 75 (2).

33 Ibid, article 75 (2).

Application process

The employer is responsible for submitting the application to the Immigration Office in the province where the workplace is located, either in person or through an authorised representative.³⁴

The employer must provide proof of the eligibility criteria above³⁵ and submit the signed employment contract.³⁶ The employer must pay the required processing fee³⁷, which is either €203.84 for remuneration less than double the minimum wage, or €407.71 for remuneration greater than or equal to double the minimum wage.³⁸³⁹ The employer is not permitted to charge this fee to the worker⁴⁰, although there are examples of bad practice where the employer takes reimbursement of the fee from the worker.⁴¹

On the worker’s side, the application must include a valid passport or travel document, documentation proving the worker’s training and, where applicable, professional qualifications.⁴²

Once the documentation has been submitted, the competent authorities will review it and in the case of any deficiencies, will grant a period of ten days for the applicant to correct or complete the application⁴³. The application then proceeds to processing, during

which the State Tax Administration and the General Treasury of the Social Security verify compliance with tax and social security obligations. A report from the Central Register of Convicted Persons is also requested regarding the worker.⁴⁴ The existence of a criminal record does not in itself constitute a ground for refusal; rather, it is assessed by the competent authorities on a case-by-case basis to ensure that the applicant is not considered a threat to public order, internal security, public health or the international relations of any of the Member States of the European Union.⁴⁵ These reports must be issued within seven days.⁴⁶

The competent authority must issue and notify the decision on the application within three months. If no response is received within that period, the application is considered to have been rejected.⁴⁷

Once the authorisation is granted, the worker can apply for a visa to enter Spain if they are not yet in the country. They must register with the social security system within three months of their regular entry into Spain or the authorisation being granted.⁴⁸ Following registration, they have one month to apply for a foreigner’s identity card.⁴⁹

34 Ibid, article 77 (1).

35 Ibid, article 77 (2) a), & c).

36 Ibid, article 77 (2) b).

37 Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería, no.144, 16 June 2025, Article 3 (1)

38 Ibid, Annex

39 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 74 (1) i).

40 Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería, no.144, 16 June 2025, Article 3 (2)

41 Information from PICUM member CONVIVE Fundación CEPAIM

42 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 77 (2) d) & e).

43 Ibid, article 77 (4).

44 Ibid, article 77 (5).

45 Ibid, article 77 (5).

46 Ibid, article 77 (5).

47 Ibid, article 77 (6).

48 Ibid, article 77 (8).

49 Ibid, article 77 (9).

Permit granted

This initial permit is usually valid for one year, unless the employment activity is shorter.⁵⁰

It is limited to the exercise of the specified employment activity: the occupation and specific geographical area of the job included in the application (but not the specific job and employer).⁵¹

Change of employer

After three months of validity and during the first year, the worker may change employers, provided the new job is in the same occupation and geographical area.⁵⁴ There is no specific procedure to be followed by the worker.

A change of employer may also be authorised at any time if the employer seriously breaches the contract or if circumstances beyond their control prevent the work from starting or continuing.⁵⁵

- In cases where the change is required because of circumstances beyond the control of the worker, the worker or employer must inform the immigration office within fifteen days, and the worker then has three months to find a new employer.⁵⁶

Autonomous communities may also establish a geographical scope within their territory, when they have the authority over work permits.⁵² Residence under the single permit counts towards the five-year period required for long-term residency.⁵³

- In the case of serious breach of contract, the worker must provide evidence of the breach of contract to the immigration authorities. Once the evidence is deemed sufficient to find a breach, the worker has three months to find a new employer and for the new employer to notify the immigration authorities.⁵⁷

During the change of employer process, the worker maintains the right to stay in Spain.⁵⁸

If the new job involves a different occupation, sector, or geographic area, the worker must request a modification of the authorisation.⁵⁹ The immigration office will decide within one month, and if no decision is issued, the modification is considered approved.⁶⁰

50 Ibid, article 73 (4).

51 Ibid, article 73 (4).

52 Ibid, article 73 (4).

53 Ibid, articles 182 & 183 (1).

54 Ibid, article 79 (1).

55 Ibid, article 79 (2).

56 Ibid, article 79 (3).

57 Ibid, article 79 (2).

58 Ibid, article 79 (6).

59 Ibid, article 192.

60 Ibid, article 192 (1).

Prior to the reform, single permit holders could change employer at any time, without any specific procedure (aside from the employer registering the employment with social security as they would with any new employment contract with any employee). These new and complex rules limiting the situations and timeframes in which workers can change employer in the first three months of their contract, and introducing new notification procedures to do so, are a rollback on workers' rights compared to the

previous rules. While these changes align with the revised EU Single Permit Directive, which provides the possibility to have such restrictions, it is optional under the directive and transposition should not have resulted in such a regression regarding workers' rights.⁶¹ Such restrictions will increase dependency of workers on employers and make it difficult for workers to challenge labour rights violations in the first three months of employment.⁶²

Additional activities

The single permit also authorises the exercise of self-employment during its validity, on the condition that the *main activity* remains employment by others, unless employment is terminated for reasons beyond

the third country national's control, in which case, the immigration office must be notified within three days.⁶³

61 Directive (EU) 2024/1233 of the European Parliament and of the Council of 24 April 2024 on a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for third-country workers legally residing in a Member State (recast), recital 44

62 See, for example, Weatherburn, A., 'The Lived Experiences of Migrants in the EU with a Single Permit', Université libre de Bruxelles: Brussels, 2023

63 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 73 (5).

Renewal

A single permit for employment can be renewed in the following situations:

- Continuation of employment wherein the employment relationship continues after the initial authorisation has expired.⁶⁴
- Partial employment during the year: When the worker has been employed for at least three months in a year and:
 - » Has a new signed employment contract with a new employer under the same conditions as those permitted in the original permit⁶⁵, or
 - » Has a new contract with differing conditions (e.g. occupation, geographic area) that also meets the requirements for the initial granting detailed in Article 74,⁶⁶ or
 - » The previous employment ended for reasons beyond their control, and they have remained continuously registered as a job seeker until the renewal application.⁶⁷
- Social protection: When the worker has been granted unemployment benefits⁶⁸, or receives public financial assistance aimed at supporting social or labour market integration.⁶⁹

- When the employment contract ends or is suspended⁷⁰ and either:
 - » the worker can prove having worked and been registered with social security for at least nine months in a twelve-month period;
 - » a family member meets the financial requirements to support family reunification;⁷¹
 - » the contract ended because the worker is a victim of sexual and/or gender-based violence.⁷²

When submitting the renewal application, the worker must provide documents to prove they meet the renewal conditions, as well as a report from the competent regional authorities confirming that any children in their care who are of compulsory school age are enrolled in school.⁷³ If the documentation does not prove school enrolment, the immigration office will notify the applicant, who must submit the required proof within one month. Failure to do so will result in the renewal being denied.⁷⁴

The employer must pay the required renewal fee⁷⁵ of €81.54.⁷⁶

64 Ibid, article 80 (2) a).
65 Ibid, article 80 (2) b) 1.
66 Ibid, article 80 (2) b) 2.
67 Ibid, article 80 (2) b) 3.
68 [Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), no. 10, 12 January 2000, article 38 (6) b).
69 Ibid, article 38 (6) c).
70 Ibid, article 38 (6) d).
71 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), [Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 80 (2) d).
72 Ibid, article 80 (2) d).
73 Ibid, article 80 (3).
74 Ibid article 80 (4)
75 [Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería](#), no.144, 16 June 2025, Article 3 (1)
76 Ibid, Annex

When assessing the renewal, the authorities may also consider whether the applicant has been convicted of a crime but has served their sentence, been pardoned, or is in conditional remission; and whether the applicant has fulfilled their tax and social security obligations.⁷⁷ However, shortfalls in social security contributions will not automatically prevent renewal if the regular performance of work activity is proven.⁷⁸

In addition, the applicant may submit information to demonstrate their efforts to integrate to support the application. This is usually a report from the autonomous community where the worker resides.⁷⁹ If such report is not issued by the regional authorities within one month, the holder may submit other acceptable proof to demonstrate their integration efforts.⁸⁰

If no decision is issued within three months of the renewal application, the authorisation is considered automatically approved.⁸¹

The renewed single permit for employment is valid for four years, unless either the initial permit was valid for less than one year in which case the renewed permit is valid for the duration of the work activity (up to one year, following which another renewal can be applied for), or a long-term residence permit is applicable. It authorises the holder to work as an employee or as a self-employed individual anywhere in the national territory and in any sector of activity. The effects of the renewed permit are retroactive to the day immediately following the expiry of the previous permit.⁸²

77 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), [Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 80 (5).
78 Ibid, article 80 (7).
79 Ibid, article 80 (6).
80 Ibid, article 80 (6).
81 Ibid, article 80 (9).
82 Ibid, article 81 (1)

Single permits for self-employed

Non-EEA nationals may also access a temporary residence and work permit for self-employed persons (single permit for self-employment)⁸³. The

Eligibility requirements

To be granted an initial permit for temporary residence and self-employment, the foreign national must:

- Be over the age of eighteen⁸⁶
- Meet the requirements established by current legislation applicable to nationals for the creation and operation of the intended activity,⁸⁷
- Hold the legally required professional qualifications or demonstrate sufficient accredited experience of the intended professional activity,⁸⁸
- Prove the intended investment is sufficient to implement the project and, where applicable, its potential impact on job creation and self-employment,⁸⁹

initial permit is valid for one year⁸⁴ and is limited to a specific geographical area.⁸⁵

- Not be subject to a period of commitment not to return to Spain, nor pose a threat to public order, public safety or public health (determined by criminal record check),⁹⁰
- Not be residing irregularly in Spain⁹¹, but can modify an existing temporary residence permit as long as the other eligibility criteria are met⁹².
- Not have an entry ban in any country with which Spain has a reciprocal agreement to that effect.⁹³

83 Ibid, article 82.
84 Ibid, article 83.
85 Ibid, article 83.
86 Ibid, article 82.
87 Ibid, article 84 a).
88 Ibid, article 84 b).
89 Ibid, article 84 c).
90 Ibid, article 84 c) & d).
91 Ibid, article 38 b).
92 Ibid, article 191 (2).
93 Ibid, article 38 c).

Application process

Foreign nationals need to submit their application and supporting documents in person, or online if already residing in Spain.⁹⁴ In addition to evidence or meeting the eligibility criteria,⁹⁵ applicants must provide a valid passport or travel document recognised by Spain, with the minimum validity of one year,⁹⁶ and a medical certificate confirming that they do not suffer from any disease that could have serious public health implications.⁹⁷

The immigration office will also request a report from the Central Criminal Records Office to verify the absence of a criminal record in Spain, as well as a police report.⁹⁸ The existence of a criminal record in the police report does not automatically constitute grounds for refusal and will be assessed on a case-by-case basis.⁹⁹

Permit Granted

The initial permit is limited to the sector of activity in one geographic area (selected by the worker on the application form).¹⁰⁵ Where the autonomous community has the relevant powers, it may determine a more limited geographical area within

The applicant must pay the required processing fee¹⁰⁰ of €203.84.¹⁰¹

Once authorisation has been granted, the applicant can apply for a visa, if they are not already in Spain.

Within three months of regularly entering Spain or the authorisation being granted, the person must enrol and pay contributions in accordance with the applicable Social Security regulations,¹⁰² or they will be considered irregularly residing in Spain.¹⁰³ Within one month of registration, the person must also apply for a foreigner's identity card.¹⁰⁴

its territory.¹⁰⁶ Additional criteria must be met if the activity is to be carried out in more than one autonomous community.¹⁰⁷ Residence under the single permit for self-employment counts towards the five-year period required for long-term residency.¹⁰⁸

94 Ibid, article 197
95 Applications will be rejected if the eligibility requirements are not met, if any submitted documentation is found to be falsified, or there's evidence of bad faith. [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 85 (3).
96 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 38 d).
97 Ibid, article 38 i).
98 Ibid, article 38 e).
99 Ibid, article 85 (2).
100 [Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería](#), no.144, 16 June 2025, Article 3 (1)
101 Ibid, Annex
102 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 85 (7).
103 Ibid, article 85 (9).
104 Ibid, article 85 (8).
105 Ibid, article 83.
106 Ibid, article 83.
107 Ibid, article 85 (6).
108 Ibid, articles 182 & 183 (1).

Renewal

Applications for renewal must be submitted during the two months prior to the expiration date of the current permit. Submitting the application within this period will extend the validity of the previous permit until the procedure is resolved.¹⁰⁹ Submitting during the three months after expiration will also extend the validity of the permit until the resolution of the procedure, although there is a risk of an administrative sanction¹¹⁰. Applicants must also submit proof that any dependent children of compulsory school age are in education¹¹¹. The immigration authorities will then verify tax and social security contributions, and obtain a police report. ¹¹²

Renewals are granted when:

- Continuity of the work activity can be proven following checks for compliance with tax and social security authorities (shortfalls do not disqualify the application),
- A family member meets the economic requirements for family reunification and can 'sponsor' the self-employed migrant,
- When the competent managing body has recognised that the self-employed worker qualifies for social protection due to cessation of activity,

- When the work activity was terminated for reasons beyond the control of the worker, including sexual or gender-based violence (in the case of economically dependent self-employed workers). ¹¹³

Efforts to integrate can also support renewal applications, mainly proven by reports from the relevant bodies of the autonomous community of residence.¹¹⁴

If no decision is given within three months of the application, the permit is considered renewed.¹¹⁵ The applicant must pay the required renewal fee¹¹⁶ of €81.54. ¹¹⁷

The renewed single permit for self-employment will be valid for four years, unless a long-term residence permit is applicable, and will authorize the holder to work as an employee or as a self-employed individual anywhere in the national territory and in any sector of activity. The effects of the renewed permit are retroactive to the day immediately following the expiry of the previous permit. ¹¹⁸

109 Ibid, article 86 (1)

110 Ibid, article 86 (1)

111 Ibid, article 86 (3)

112 Ibid, article 86 (5)

113 Ibid, article 86 (2)

114 Ibid, article 86 (6)

115 Ibid, article 87 (2)

116 Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería, no.144, 16 June 2025, Article 3 (1)

117 Ibid, Annex

118 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 87 (1)

‘Seasonal’ work permit

Residence and work permits for seasonal activities ('seasonal work permits'¹¹⁹) authorise non-EEA nationals to reside in Spain and work as employees

for a maximum period of nine months within a calendar year.¹²⁰

Eligibility requirements

For a job to be done by a worker on a seasonal work permit, a fixed-term employment contract must be formalised in writing in accordance with Spanish labour law.¹²¹ This contract must clearly specify the period of employment activity,¹²² which cannot be more than nine months per calendar year.¹²³ The national employment situation must permit the hiring of foreign workers¹²⁴ except for those occupations included in the annual list of job forecasts approved through collective management procedures, which are governed by their own rules.¹²⁵

To be granted a seasonal work permit, the worker must be 16 or older¹²⁶, and must not already reside or be present in Spain.¹²⁷ They must hold any administrative certificates or licenses required to perform a regulated professional activity, in line with applicable sectoral regulations.¹²⁸

Both parties must also comply with the current health, safety and occupational regulations, as well as internal rules on living conditions in farms or other provide accommodation.¹²⁹

119 Temporary migration programmes have been found to significantly increase risks of labour exploitation, debt bondage, and reliance on intermediaries. Even in situations where work is linked to seasons such as in agriculture, the need for workers does not disappear, and the programmes create precarity for workers in both country of origin and country of migration. See PICUM, [Designing labour migration policies to promote decent work](#), PICUM, 2021

120 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 100; Ministerio de Inclusión, Seguridad Social y Migraciones, 'Hoja 23 – Autorización de residencia temporal y trabajo para actividades de temporada', Sede Electrónica de las Administraciones Públicas, last updated May 2025.

121 Ibid, article 102 (1) b)

122 Ibid, article 102 (1) g)

123 Ibid, article 101 (1)

124 See above on assessing national employment situation

125 Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado, no. 280, 20 November 2024, article 102 (2)

126 Ibid, article 100

127 Ibid, article 102 (1) a).

128 Ibid, article 102 (1) j)

129 Ibid, article 102 (1) i)

Application process

The application process follows similar steps to those established for the single permit for employment, with the employer responsible for submitting the application and paying the corresponding processing fee¹³⁰. The application must be filed at least two months before the start of the planned work activity.¹³¹

In addition to the standard documentation, there are number of additional conditions that must be met and corresponding documentation provided by the employer:

- proof that the worker has been informed of their rights¹³²,
- evidence of having applied for health insurance¹³³,
- confirmation that suitable accommodation will be provided,¹³⁴
- a commitment to organise the worker’s travel arrangements, and

- a sworn statement attesting to the employer's financial solvency and compliance with tax and social security obligations.¹³⁵

The employer must also submit an affidavit signed by the worker confirming their commitment to return¹³⁶ and to comply with the applicable return procedures.¹³⁷

The immigration office must issue a reasoned decision and notify the applicant within a maximum period of one month. If no decision is issued within that timeframe, the application is considered rejected.¹³⁸

Once notified of approval, the worker must apply for the corresponding visa at the competent Spanish authority within one month.¹³⁹ Upon entering Spain, the employer must register the worker with the social security system within three days.¹⁴⁰

130 Ibid, article 103 (1) & 77
131 Ibid, article 103 (2)
132 Ibid, article 103 (3) a)
133 Ibid, article 103 (3) b)
134 Ibid, article 103 (3) c)
135 Ibid, article 103 (3) e)
136 Ibid, article 103 (3) d)
137 Ibid, article 103 (3) f)
138 Ibid, article 103 (4)
139 Ibid, article 103 (5)
140 Ibid, article 103 (6)

Permit Granted

The seasonal work permit is granted for four years and is valid for a maximum of nine months per calendar year¹⁴¹, and is limited to a regional geographic area and a single occupation.¹⁴²The permit obliges the employer, if all requirements continue to be met, to call the permit holder for employment for each year of the permit’s duration within the framework of the employment contract.¹⁴³¹⁴⁴

Extension of the work activity period

The work activity period during the year may be extended when the employment relationship with the original employer ends. The extension may be granted either with the same or a different employer, and in the same or a different geographical area, as long as the occupation and sector remain the same. Successive extensions are permitted, if the total period of work activity does not exceed nine months within a year and there is continuity between the end of one period and the start of the next.¹⁴⁵ If the work period concludes while the extension procedure is still pending, the worker is permitted to remain in Spain until a decision is made, as long as the application was submitted within the validity period of the original authorisation, that the delay is not attributable to the worker, and that the nine-month maximum annual limit has not been exceeded.¹⁴⁶

141 Ibid, article 101 (1)
142 Ibid, article 101 (1)
143 Ibid, article 102 (4)
144 In practice, this is not always the case. See 'Seasonal work permits in practice'
145 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 111
146 Ibid, article 112 (5)
147 Ibid, article 110 (1)
148 Ibid, article 110 (2)
149 Ibid, article 110 (2)

Change of employers

Workers on seasonal work permits may change employers before the end of their contract:

1. **After completing at least three months of work under their existing contract.** The new employer must submit a request to hire the worker before the end of the employment period agreed with the previous employer. The new activity may take place in a different region or occupation, provided the national employment situation allows for it within the same sector.¹⁴⁷
2. **At any time, if the initial employer seriously breaches the obligations set out in the employment contract,** as defined under Spanish labour law. In such cases, the worker has up to three months from the time sufficient evidence of the existence of the serious breach is obtained to find a new employer, and for the new employer to contact the competent authority to report the change in the position of the previous employer (if the occupation is the same) or submit a new application for a Seasonal work permit or Single work permit.¹⁴⁸ The new application will not require verification of the national employment situation but must meet all other requirements for authorisation, except the requirement that the worker not be present in Spain specifically for seasonal work.¹⁴⁹

3. When circumstances beyond the employer’s control make it impossible to carry out the work activity. In such cases, the worker or the employer must notify the immigration office within fifteen days.¹⁵⁰ This opens a one-month period during which a new employer may express their intention to replace the previous one.¹⁵¹

In all cases, the total duration of seasonal work within a year, including periods of employment with different employers, may not exceed nine months.¹⁵²

Renewal

Seasonal work permits may also be renewed after expiry for additional four-year periods.¹⁵⁵ The renewal may be requested by the same or a different employer, provided that all regulatory requirements are met, including not applying from within Spain. The renewal must correspond to the same sector of activity, although changes in occupation or geographical area are allowed. The renewal shall be authorised by the same or appropriate body, depending on the geographical area.¹⁵⁶

The immigration office must notify the applicant within one month of its decision, and provide reasoning¹⁵⁷. If no decision is issued within this period, the renewal is considered approved.

Within one month of receiving notification of approval, the worker must apply for the corresponding visa at the competent Spanish Consular office.¹⁵⁸

When the change of employer occurs, the immigration office must resolve the application within fifteen days. If no decision is issued within the deadline, the application is deemed rejected.¹⁵³ The worker retains the right to remain in Spain while awaiting a decision, provided the change of employer was requested within the legally established timeframe.¹⁵⁴

Once in Spain, the employer must register the worker with the social security system withing three days of entry.¹⁵⁹

If the work period concludes while the renewal procedure is still pending, the worker is permitted to remain in Spain until a decision is made, as long as the application was submitted within the validity period of the original authorisation, that the delay is not attributable to the worker, and that the nine-month maximum annual limit has not been exceeded.¹⁶⁰

The renewal procedure remains employer-owned, and the worker is normally required to not be in Spain during the process.

150 Ibid, article 110 (3)
151 Ibid, article 110 (3)
152 Ibid, article 110 (4)
153 Ibid, article 110 (5)
154 Ibid, article 110 (6)
155 Ibid, article 112 (1)
156 Ibid, article 112 (1)
157 Ibid, article 112 (2)
158 Ibid, article 112 (3)
159 Ibid, article 112 (4)
160 Ibid, article 112 (5)

Collective hiring from countries of origin:
Gestión Colectiva de Contrataciones en Origen (GECCO)

Collective management is a procedure to grant multiple initial residence and work permits simultaneously to foreign workers who are outside Spain, based on job offers submitted by employers.¹⁶¹ The procedure can be used for both 'stable' (i.e. single permit for employment, lasting one year) and 'circular' or seasonal' permits (i.e. a permit of four-years, where workers are permitted to work a maximum of nine months in a calendar year). It can also be used for job-seeker visas¹⁶².

These recruitment procedures are generally directed towards countries with which Spain has signed agreements on the regulation and management of migratory flows¹⁶³. Spain has bilateral agreements signed with different countries including Colombia, Ecuador, Morocco, Mauritania, Ukraine, Honduras, Senegal, and the Dominican Republic, with the aim of operationalising the GECCO system¹⁶⁴. Collective management of recruitment at source involves consultations with provinces, the State Public Employment Service, and the Commission for Labour and Immigration.

As is the case for seasonal work permits not governed under the GECCO framework, intermediaries and local authorities are not allowed to charge for the process, so theoretically the selection process is free of charge for the workers. Employers must provide a signed contract before the worker enters Spain, and employers must provide a translated copy for workers who do not understand Spanish. Employers must also provide the cost of travel from the country of origin to Spain, from the arrival point to accommodation, and provide accommodation for workers hired on seasonal permits.¹⁶⁵ If workers undergo training in Spain or in the country of origin for the job, it must be free of charge.¹⁶⁶

The GECCO framework is used to manage the majority of Spain's 'seasonal' labour migration,¹⁶⁷ and as a result, the work permits outlined below are similar in requirement and rights as the seasonal work permits described previously. Differences between the rights granted, and the application process, are highlighted below.

161 Ibid, article 113 (1)
162 Ibid, article 114
163 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 103 (7)
164 Information from the Mutual Learning Session with CONVIVE Fundación Cepaim and Red Acoge, 8 April 2025, see also [Order ISM/1488/2024](#), of December 27, regulating the collective management of recruitment at origin for 2025, article 15 (2)
165 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social, Boletín Oficial del Estado](#), no. 280, 20 November 2024, article 118 (1, 2, 3)
166 Ibid, article 120
167 Migration Partnership Facility (MPF), Re-thinking approaches to labour migration. Potentials and gaps in EU member states' migration infrastructures, ICMPD: Brussels, 2024

Eligibility requirements

The number and types of jobs that need to be filled is based on a forecast by the Ministry of Inclusion, Social Security, and Migration.¹⁶⁸ Workers applying for a ‘stable’ permit must comply with the same requirements as the Single permit for employment (outlined in article 74).¹⁶⁹ Workers applying for the

Application procedure

Employers will send applications to collectively manage job offers to the relevant governing body (this can be a department of labour or immigration, or an immigration office depending on the delegating process by the autonomous community).¹⁷² Applications that are accepted will be forwarded to the Directorate General for Migration Management, which will initiate the necessary pre-selection procedures for workers in the country of origin and authorise the beginning of the selection process.¹⁷³

‘circular’ permit must comply with the same requirements as other seasonal worker applicants (detailed in articles 102 and 106).¹⁷⁰ Essentially – for workers, the same eligibility requirements apply as when applying for these permits outside of the GECCO framework, as described above.¹⁷¹

The employer has the right to delegate this his process to hiring agencies in the country of origin.¹⁷⁴ The Directorate General will liaise with the General Commissariat of Immigration and Borders, to assign the workers a foreign ID number (and communicate any potential reasons for denial of the permit if needed).¹⁷⁵ The governing body will then notify the employer,¹⁷⁶ who submits the visa applications to the relevant consular office.¹⁷⁷

168 Ibid, article 115
169 Ibid, article 116 (1)
170 Ibid, article 116 (2)
171 Ibid, article 116
172 Ibid, article 122 (1)
173 Ibid, article 122 (5)
174 Ibid, article 122 (7)
175 Ibid, article 122 (9)
176 Ibid, article 122 (10)
177 Ibid, article 122 (11)

Permit granted

The GECCO process can be used for one-year (‘stable’) and four-year (‘circular’) permits, as well as job-seeking visas.¹⁷⁸ However, it is primarily used for four-year permits which contain similar rights and obligations to the seasonal work permit, and the processes for extension, change of employer, and renewal detailed below and in the Ministerial Order regulating GECCO for 2025 refer to the seasonal work permits.

Change of employer

The GECCO Order 2025 includes provisions to allow for the change of employer, including change of

geographical location, but the occupation and sector must remain the same.¹⁷⁹ The request can be made by the initial or new employer, with the consent of all affected workers.¹⁸⁰

If workers change employers but remain continuously employed without interruption between contracts, the work activity period may be extended, provided it doesn’t exceed nine months in total per calendar year, including any previous extensions.¹⁸¹

This order brings the procedure for change of employer in line with that of the Seasonal work permit not organised through the GECCO process.

Renewal

Seasonal work permits organised through the GECCO process can be renewed beyond the initial four-year period, for additional periods of the same length. The request must be made by the initial employer (it is not possible to renew through GECCO with a new employer, a new permit must be applied for), with the consent of the worker and supporting documentation demonstrating the need for extension.¹⁸²

Workers who have held the four-year permits may also apply for a two-year residence and work permit which will enable them to work for other employers

or as self-employed.¹⁸³ The application must be made once the worker has returned to their country of origin, within six months of the expiry of the initial seasonal work permit.¹⁸⁴ Workers require a criminal record certificate from countries in which they have resided over the previous five years, and an employment contract guaranteeing 100% of minimum wage. This permit can be extended for an additional two years, and renewed, eventually offering a path to long-term residence.¹⁸⁵

178 Ibid, article 114
179 [Order ISM/1488/2024](#), of December 27, regulating the collective management of recruitment at origin for 2025, article 7 (1)
180 Ibid, article 7 (2)
181 Ibid, article 7 (6)
182 Ibid, article 8 (1, 2)
183 Ibid, article 9 (1)
184 Ibid, article 9 (3a, 3b)
185 Ibid, article 4

Seasonal work permits in practice

While the regulations for Seasonal work permits and the GECCO framework provide several protections for workers, in practice, many workers experience labour rights violations and are unable to challenge poor conditions without risking their continued residence and employment in Spain.¹⁸⁶

The complications around the process to change employer and reliance on employers for the procedure push workers into precarity and risk of becoming undocumented. In particular, the fact that GECCO permits can only be renewed by the same employer means that the majority of 'seasonal' workers have very little real access to labour rights.¹⁸⁷

Employer-provided accommodation means that workers are also dependent on their employers for their housing, increasing risks and challenges in advocating for labour rights and promised conditions.

The focus on 'circular' migration, with the limitation of employment to nine months per year, and the permit being contingent on the worker returning home, also pushes some workers to live and work irregularly in Spain in order to support themselves and their families.¹⁸⁸

186 Information from the Mutual Learning Session with CONVIVE Fundación Cepaim and Red Acoge, 8 April 2025.
187 Molinero-Gerbeau, Y., 'Exploitation embedded in Spain's seasonal worker programme', OpenDemocracy, 22 October 2024
188 Ibid

Selection of policy recommendations	Indicators	VLS-TS and Temporary Residence Permit for 'Temporary' or 'Salaried' Workers
1. Streamlined and efficient procedures		
Good administration: Procedures to obtain and renew visas and permits should be streamlined with reasonable administrative requirements.	1.1 Number of steps in application procedure	Single permit for employment: This is met to some extent. Administrative requirements and the procedure are largely reasonable. However, it remains very difficult for workers in certain jobs to access single permits, despite demand, due to the 'national employment situation' criteria and due to the challenges of international recruitment. In particular, the catalogue of shortage occupations does not accurately reflect the reality of the labour market and it can be difficult to pass the labour market test. There are a number of grounds for renewal of permits, though some of the conditions and proof are challenging for some workers to provide. Fees for initial applications depend on the workers' income (€203.84 or €407.71 for remuneration equal or greater than double the minimum wage) and must be paid by employers. Fees for renewal are paid by employers, and are lower (€81.54) but might present a barrier for some workers. Seasonal work permit: This is met to some extent. There are considerable requirements and conditions for seasonal work permits to be granted. Though many are intended to protect workers, some are unnecessary, such as the worker not residing in Spain and it is difficult for workers to access a permit outside of the collective management system (GECCO).
Information about application procedures, requirements, and applicable rules should be provided publicly for potential employers and workers in clear and accessible language.	1.2 Accessibility of information about procedures and applicable rules	This is not met. The information is primarily available in Spanish, and contained within legal documents, with some processes also outlined on the Spanish Government Ministry of Inclusion, Social Security and Migration website. Additionally the absence of a centralised information source complicates the process of gathering clear information.
Based on an offer of employment: An offer of employment, with conditions in line with applicable labour law or collective bargaining agreements, should be sufficient across all jobs and sectors.	1.3 Eligibility/ non-eligibility requirements to access a permit with a job offer	This falls short. For both the single permit for employment and the seasonal work permit, the job must also meet 'national employment situation' criteria – either being listed in the catalogue of shortage occupations or passing a labour market test, unless issued under collective management (GECCO). In this case, there is still a limitation of eligible jobs, based on an annual list of job forecasts.

Selection of policy recommendations	Indicators	VLS-TS and Temporary Residence Permit for 'Temporary' or 'Salaried' Workers
Stability for workers and employers: Permits should be of a reasonable duration, of at least two years.	1.4 Length of permit	Single permit for employment: This met to some extent. The initial permit is only valid for a maximum of one year. Nonetheless, on renewal, it is valid for four years, which does provide stability. However, it can be challenging for some workers to meet the conditions for renewal. Seasonal work permit: This falls short. The permit is granted for four years. The employer is obliged, if all requirements continue to be met, to call the permit holder for employment for each year of the permit's duration. However, the permit is only valid for the worker to work for a maximum of nine months in the calendar year in Spain; they are supposed to leave Spain when not working and for a minimum of three months per year, creating significant difficulties and instability for workers.
In-country applications: People should be able to apply for the various residence and work permits provided for by national law from within the country, regardless of their status, including when undocumented. Restrictions on people changing from one type of status or permit to another should be lifted.	1.6 In-country applications including when undocumented 1.7 Status/ permit can be converted into another	Single permit for employment: This is met to some extent. It is possible to apply for a single permit from within the country, but only with a valid residence authorisation, people on visit visas and residing undocumented in Spain are ineligible. Nonetheless, undocumented people may be able to regularise their status through the various regularisation mechanisms (see in particular, the <i>arraigo</i> system), and it is possible to transition to the single permit. In addition, there is a job-seeking visa available for children and grandchildren of Spanish national by origin and for certain occupations and geographical areas, under certain conditions, which can facilitate in-country applications for these groups. Seasonal work permit: This is not met. The worker cannot be residing in Spain (even if regularly), at the time of applying for the permit. This also applies to permits organised through GECCO.

Selection of policy recommendations	Indicators	VLS-TS and Temporary Residence Permit for 'Temporary' or 'Salaried' Workers
2. Autonomy for workers		
Worker-owned procedures: Workers should be able to apply for permits themselves.	2.1 Ownership of application process/ worker or employer-made application	This is not met. For both the single permit and the seasonal work permit, it is the employer who submits the application.
Labour market mobility: Permits should not be tied to one employer. People should be able to change employer, including the type of job and sector, and work for more than one employer, on the same permit, without permission from the employer or labour intermediary.	2.2 Procedure to change employer 2.3 Procedure to change type of job 2.4 Procedure to change sector 2.5 Possibility to work for more than one employer 2.6 Time period before to change employer	Single permit for employment: This is met to some extent. Workers may change employer without any specific procedure (aside the normal registration of employment carried out by employers for all employees), but only within the same occupation and region and only <i>after the first three months</i> of employment, unless there is a serious breach of contract by the employer or circumstances beyond the worker and employer's control that prevent the work from starting or continuing (in which case the worker can change employer in the first three months using the following procedures: <u>For serious breach of contract</u> , the worker must provide the immigration authorities with sufficient evidence of the breach of contract, and has three months from when this is approved by the authorities to find a new employer and for the new employer to notify the authorities. <u>For circumstances beyond control</u> , either the worker or the employer must notify the immigration authorities within 15 days, and the worker has three months to find a new employer. These limitations were only introduced by the recent reform of the rules, and represent a regression for workers' rights compared to the previous system where workers could change employer without any specific procedure at any time. The procedures for the exceptions and the short timeframe to find new employment (three months) are complex and will push some workers into dependency and irregularity. If the worker wishes to change occupation or region, they must apply for a modification of the authorisation, which must be processed within one month.

Selection of policy recommendations	Indicators	VLS-TS and Temporary Residence Permit for 'Temporary' or 'Salaried' Workers
		<p>Seasonal work permit: This falls short. The rules for workers on seasonal work permits are similar to single permit holders but are more restrictive in the following ways:</p> <p><u>When changing employer after three months</u>, the new employer has to submit a request to hire the worker, before the end of the employment period agreed with the previous employer and meet the 'national employment situation criteria' even when the new employment is in the same occupation and region.</p> <p><u>For circumstances beyond control</u>, there is only a one-month period for a new employer to express their intention to employ the worker.</p> <p>It is important to note that in cases of serious breach of contract, as in the case of single permit holders, only notification by the new employer is required if in the same occupation, and if the new employer applies for a new seasonal work permit or single permit for employment, the 'national employment situation' criteria is not applied.</p> <p>In all cases, the duration of employment on a seasonal permit may not exceed nine months in the calendar year.</p>
<p>Independence from employers: Permits should remain valid to provide a reasonable period of time of unemployment to search for alternative work, for workers that lose or leave their job.</p>	<p>2.7 Time periods for unemployment/ job search during validity of permit and after the permit has expired</p>	<p>Single permit for employment: This is met. Permits remain valid during unemployment. There are also various conditions under which the permit can be renewed when the person has been unemployed or is currently unemployed.</p> <p>Seasonal work permit: This is not met. Permit holders are supposed to leave Spain when not in employment, aside from the specific time periods described above in which they can change employer.</p>
<p>Financial and practical support should be accessible during this time, at least on the same terms as nationals. Particular attention should be paid to situations where workers' housing was also provided by their employer.</p>	<p>2.8 Available financial and practical support while unemployed</p>	<p>Single permit for employment: This is met.</p> <p>Seasonal work permit: This is not met.</p>

Selection of policy recommendations	Indicators	VLS-TS and Temporary Residence Permit for 'Temporary' or 'Salaried' Workers
3. Equality and family unity		
<p>Non-discrimination: Access to employment and associated permits should be non-discriminatory across all protected grounds under human rights law. If there is preferential treatment, including for certain nationalities, this should be justifiable in relation to pre-existing disadvantage.</p>	<p>3.1 Restrictions in access to permits on prohibited grounds 3.2 Justification for preferential treatment, if applicable</p>	<p>Single permit for employment: This is met. These permits are also available to people as of age 16.</p> <p>Seasonal work permit: This is met to some extent. There is no discrimination on the basis of age, gender or nationality in the rules. However, most permits are issued under the collective management framework (GECCO), and so to people of particular nationalities, based on agreements for cooperation on migration management. Particular profiles have also been prioritised, that are considered more likely to return (e.g. migrant women with dependent children in their country of origin).</p>
<p>Family unity: Migrant workers should be able to enjoy their family life as any other person. Restrictions on migrant workers with low income from bringing their families should be lifted</p>	<p>3.5 Possibilities to and restrictions on access to permits for family members</p>	<p>Single permit for employment: This is largely met. Permits require an employment contract providing at least minimum wage, which in 2025 covers 150% of 'IPREM', the indicator used for administrative procedures. The income requirement for family reunification is 150% of IPREM, between the applicant and the family member being reunited, with 50% added per additional family member.</p> <p>Seasonal work permit: This not met. There is no provision for family reunification for seasonal work permit holders.</p>
<p>Spouses/ partners should also be provided access to the labour market.</p>	<p>3.6 Access to the labour market for family members</p>	<p>Single permit for employment: This is met.</p> <p>Seasonal work permit: n/a</p>
5. Social Inclusion		
<p>Pathways to settlement: There should also be pathways to settlement after a number of years. All periods of residence should count towards long-term residence status.</p>	<p>5.1 Residence counts towards long-term residence or settled status</p>	<p>Single permit for employment: This is met to a large extent. Residence under the Single permit counts towards long-term residence status, and renewals of the initial one-year permit are valid for four years, providing a direct path to long-term residence status, which requires five years of residence. However, whilst a period of irregular residence can be used to regularise under the <i>arraigo</i> system, this period does not count towards long-term residence.</p> <p>Seasonal work permit: This falls short. The Seasonal work permit granted under the GECCO framework offers a pathway to a two-year residence and work permit that counts towards long-term residence status. However, the four years of seasonal work does not count towards long-term residence due to the lack of continuity.</p>

Section 2: Regularisation through the *arraigo* system

Undocumented people residing in Spain can apply for temporary residence permits for exceptional circumstances in the following specific situations:

- Cases of *arraigo*¹⁸⁹
- Victims of gender-based violence ¹⁹⁰
- Collaborators against organised crime¹⁹¹
- Victims of human trafficking¹⁹²
- If they meet the criteria for the short-term regularization programme announced in January 2026 (details forthcoming).

The reform of the regulation¹⁹³ which entered into effect on 20 May 2025 adapts the system of *arraigo*. It has been in some ways simplified – with general requirements applied across all subtypes. Between the entering into effect of the reform and 31 October 2025, 95,000 people were regularised under the *arraigo* framework.¹⁹⁴

It replaces or modifies previous subtypes and introduces a new category, creating a total of five forms of *arraigo*¹⁹⁵:

- The *arraigo sociolaboral* (socio-occupational);
- The *arraigo social* (social);
- The *arraigo socioformativo* (socio-educational);
- The *arraigo segunda oportunidad* (second opportunity);
- The *arraigo familiar* (family).

The five different types of *arraigo* currently in force are outlined below.

189 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Boletín Oficial del Estado, no. 280, 20 November 2024, article 125.

190 Ibid, article 137 –141.

191 Ibid, articles 142 – 147.

192 Ibid, articles 148 – 155.

193 The Spanish Immigration Reform (Reforma del Reglamento de Extranjería) introduced by Royal Decree 1155/2024 on 19 November 2024 updates the regulatory framework for managing migration in Spain, namely reforming Organic Law 4/2000 ([Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#).)

194 ‘Applications to reside and work in Spain have increased by nearly 50% since the new Immigration Law Regulations came into effect.’ Spanish Ministry of Inclusion, Social Security, and Migration,21 November 2025

195 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Article 125

Eligibility requirements

General requirements for *Arraigo* applications

As well as the specific criteria for the individual *arraigos*, common criteria must be met for all *arraigo* applications¹⁹⁶:

- Applicants must be resident in Spain for at least two years prior to the application (with the exception of the *arraigo familiar*), and not have the status of applicant for international protection, both when applying for the *arraigo* and during the application process.
 - » For those who had applied for international protection and had their request denied, the time spent in Spain during the processing of the protection request is not counted.

- » The residence period is counted from two months after the refusal of the international protection application is communicated (meaning the appeal period has elapsed).
- Applicants must also not represent a 'threat to public order, security, or public health', and not have a criminal record in Spain or any other country of residence over the last five years prior to entering Spain.¹⁹⁷
- Applicants must also not be deemed 'inadmissible' in countries with which Spain has a reciprocal agreement, and not be within the period of commitment to non-return to Spain (if applicable).

Socio-occupational *Arraigo* ('*Arraigo sociolaboral*')

The new *arraigo sociolaboral* requires applicants to present at least one employment contract guaranteeing at least the minimum interprofessional salary (SMI), proportional to the hours worked, and a minimum of 20 hours of work per week across all contracts¹⁹⁸.

The *arraigo sociolaboral* offers flexibility by allowing applicants to present multiple contracts, including seasonal or temporary employment, or work for different employers simultaneously. Employers must also prove the viability of the contracts, as with other

work permits per Article 74.¹⁹⁹ The reform also eliminates the need for an integration report (*informe de arraigo*), simplifying the application process for this category. ²⁰⁰ However, many undocumented workers work in labour sectors with high levels of undeclared work (in particular, hospitality, street vending, sex work, domestic work and agriculture) are unable to provide formal employment contracts to regularise under this pathway.

196 Ibid, Article 126

197 This record refers only to acts considered crimes under Spanish law, so irregular entry and/or residence are not counted here. Information from mutual learning session with PICUM, CEPAIM, and Red Acoge, 8 April 2025.

198 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Article 127 (b)

199 Ibid, Article 127 (b)

200 Ibid, Article 127

Social arraigo ('arraigo social')

The new arraigo social requires either:

- proving family ties, such as a spouse, registered partner, or first-degree relatives residing in Spain. Family must have access to financial resources equivalent to 100% of the *Indicador Público de Renta de Efectos Múltiples*²⁰¹ (IPREM)²⁰² , or
- presenting a favourable social integration report from regional authorities. This report must confirm participation in training programs, respect for constitutional and human rights values, and language proficiency, where applicable. In cases where the integration report is delayed beyond 30 days, applicants are allowed to provide alternative evidence to fulfil this requirement.²⁰³

Socio-educational arraigo ('arraigo socioformativo')

The new *arraigo socioformativo*²⁰⁴ mandates that applicants present an integration report, and be enrolled in or currently pursuing²⁰⁵ the following eligible training programs/courses:

- Post-secondary education
- Professional certifications
- Training programs for high-demand occupations
- Adult education programs.

Second opportunity arraigo ('arraigo de segunda oportunidad')

The new category, the *arraigo de segunda oportunidad*²⁰⁶, has been created to address situations where migrants have lost their residence permit due to reasons beyond their control. This category requires applicants to prove that they were previously holders of a temporary residence permit, and that the inability to renew their permit stems from

reasons unrelated to public order or security.

This pathway particularly benefits individuals who could not meet renewal requirements due to insufficient income or employment.

201 The public index used by the Spanish government to set economic thresholds for administrative procedures

202 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Article 127 (c)

203 Ibid, Article 127 (c)

204 Ibid, Article 127 (d)

205 Under the previous arraigo para la formación requirements, applicants who were already attending these programs were not eligible. They needed to officially enrol at the time of application.

206 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Article 127(a)

Familiar arraigo ('arraigo familiar')

The *arraigo familiar* has undergone significant adjustments and now applies exclusively to official caregivers or guardians of EU, EEA, or Swiss nationals (and not of Spanish nationals). Unlike other categories, this pathway does not require a minimum period of residence.²⁰⁷

To qualify, individuals must²⁰⁸: either demonstrate parental or caregiving responsibilities for EU national children residing in Spain or provide support to a

disabled family member who they live with, ensuring their capacity to live independently.

New rules on family reunification have been established for the relatives of Spanish citizens²⁰⁹. The rules are separated from *arraigo familiar* but the permit can be applied for by eligible family members²¹⁰ residing undocumented in Spain, except for adult children (over 18) who must apply from their country of origin.

Application process

In all cases, the application must be made in person (children or people with disabilities needing support can apply through their representative). A completed application form is required, along with a valid passport or ID document recognised in Spain. Proof of two years residency in Spain is required, either through registration documents or other documentation such as bills.

A criminal record check from any other countries lived in over the past five years is also required.

There is a processing fee of €38.28²¹¹ depending on

the region.

Depending on the type of *arraigo* being applied for, proof of being in the relevant situation is also required (e.g. work contract and company details, integration report, proof of prior permit etc)²¹². Documents from other countries must be translated into Spanish by a sworn translator.

Decisions must be issued within three months, but depending on the region, some decisions can take up to eight months.

207 Ibid, Article 127 (e)

208 Ibid, Article 127 (e)

209 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), CAPÍTULO VII. Residencia temporal de familiares de personas con nacionalidad española

210 Eligible family members include spouses or civil partners. Children automatically qualify if they are under 26 and reside with or are financially dependent on the Spanish national. Those over 26 must demonstrate financial dependency or a disability requiring support. Ascendants, such as parents, may qualify if they can prove financial dependency or if humanitarian reasons apply, such as severe health conditions. A parent, legal guardian, or caregiver of a Spanish minor may also be eligible, provided they meet the legal criteria set by Spanish law. Other relatives not included in the previous categories can apply if they demonstrate a credible need for support based on dependency, cohabitation, or serious health or disability issues. In such cases, they must provide evidence of their situation.

211 [Orden PJC/617/2025, de 13 de junio, por la que se establece el importe de las tasas por tramitación de autorizaciones administrativas y documentos de identidad en materia de inmigración y extranjería](#), no.144, 16 June 2025, Annex

212 [Real Decreto 1155/2024, de 19 de noviembre, por el que se aprueba el Reglamento de la Ley Orgánica 4/2000, de 11 de enero, sobre derechos y libertades de los extranjeros en España y su integración social](#), Article 130

Permit Granted

The residence permit granted by regularisation through *arraigo* is a specific temporary residence and work permit valid for one year, except the *arraigo familiar* which provides a permit valid for five years.

Renewal

These permits can be extended and transitioned into other types of temporary residence and work permits.

To transition to a single permit, it requires proof of employment for at three months during the validity period, verified through social security contributions, or through registration with the public employment and actively job-seeking.²¹⁵

There is no geographical, sectoral or other restriction for the work other than it meeting applicable labour and other standards, and it is also possible to be self-employed.²¹³ The exception is the permit granted through the *arraigo socioformativa*, which allows the holder to work for a maximum of 30 hours per week.²¹⁴

Under the *arraigo socioformativo*, renewal or extension of the permit depends on obtaining a report from the corresponding training centre certifying promotion to the second course for basic or medium-level vocational training cycles. If the training is completed before the end of the year, the extension will be conditioned on providing proof of the obtained certificate or degree and on being actively job-seeking while duly registered with the public employment service²¹⁶.

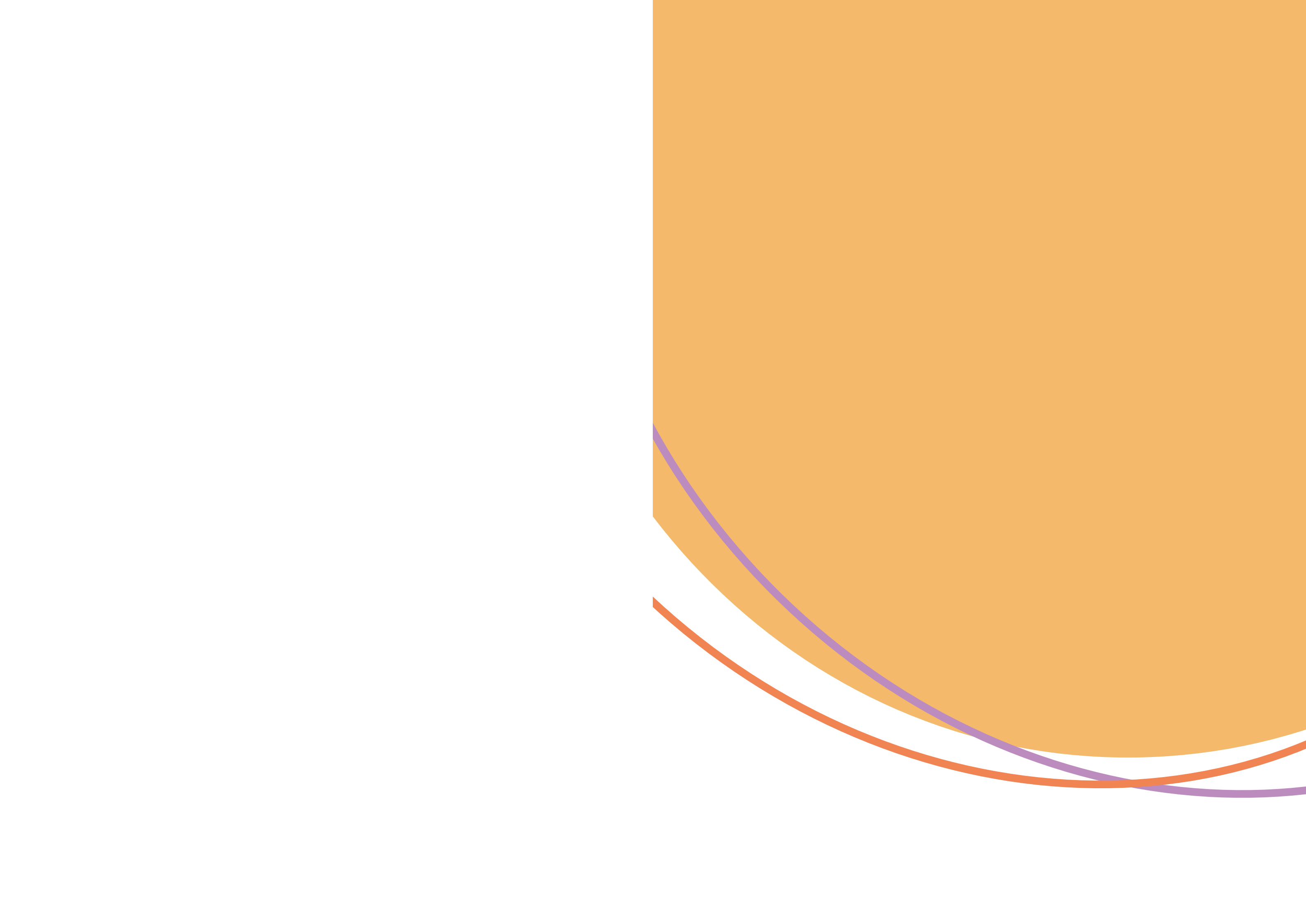
213 Ibid, article 131
214 Ibid, article 131 (b)
215 Ibid, article 132.
216 Ibid, article 132.

Analysis of the *arraigo* system compared to PICUM’s key recommendations and indicators

Selection of policy recommendations	Indicators	
1. Streamlined and efficient procedures		
Good administration: Procedures to obtain and renew visas and permits should be streamlined with reasonable administrative requirements.	1.1 Number of steps in application procedure	This is met to a large extent. There is a unified application process and general eligibility criteria which apply, with some exceptions, across all regularisation pathways under the <i>arraigo</i> system. Each pathway has additional criteria, with evidential requirements that are possible for many undocumented people to meet. However, many people are not able to meet the requirements. In particular, many undocumented workers work in sectors (in particular, hospitality, street vending, sex work, domestic work and agriculture), with high levels of undeclared work, and so face structural barriers to meeting the eligibility criteria and administrative requirements. Processing fees reach up to €39.
Information about application procedures, requirements, and applicable rules should be provided publicly for potential employers and workers in clear and accessible language.	1.2 Accessibility of information about procedures and applicable rules	This falls short. Information is available only in Spanish, and the <i>arraigo</i> types must be searched by type before the relevant page on the government website is visible. In addition, certain information is accessible only via pdf (meaning machine translation is more difficult),
Based on an offer of employment: An offer of employment, with conditions in line with applicable labour law or collective bargaining agreements, should be sufficient across all jobs and sectors.	1.3 Eligibility/ non-eligibility requirements to access a permit with a job offer	This is met to a large extent. The <i>arraigo sociolaboral</i> is the pathway that is directly linked to employment, it requires presentation of one or more work contract(s) that total a minimum of 20 hours per week at the hourly minimum wage. There are no restrictions in terms of occupation, sector or region, no labour market tests or quotas. However, as noted above, workers in key sectors are often unable to present formal employment contracts.
Stability for workers and employers: Permits should be of a reasonable duration, of at least two years.	1.4 Length of permit	This falls short. <i>Arraigo</i> permits last one year. Nonetheless, it is possible to renew and transition to other forms of temporary residence and work permits.

Selection of policy recommendations	Indicators	
In-country applications: People should be able to apply for the various residence and work permits provided for by national law from within the country, regardless of their status, including when undocumented. Restrictions on people changing from one type of status or permit to another should be lifted.	1.6 In-country applications including when undocumented 1.7 Status/ permit can be converted into another	This is met to some extent. The <i>arraigo</i> permits require the applicant to be residing in Spain with an undocumented status. However, the recent reforms exclude applicants for international protection and the time residing during the application period. This is met.
2. Autonomy for workers		
Worker-owned procedures: Workers should be able to apply for permits themselves.	2.1 Ownership of application process/ worker or employer-made application	This is met.
Labour market mobility: Permits should not be tied to one employer. People should be able to change employer, including the type of job and sector, and work for more than one employer, on the same permit, without permission from the employer or labour intermediary.	2.2 Procedure to change employer 2.3 Procedure to change type of job 2.4 Procedure to change sector 2.5 Possibility to work for more than one employer 2.6 Time period before to change employer	This is met. Workers are not restricted in the location or sector of their work, provided it meets labour standards. Workers can also be self-employed.
Independence from employers: Permits should remain valid to provide a reasonable period of time of unemployment to search for alternative work, for workers that lose or leave their job.	2.7 Time periods for unemployment/ job search during validity of permit and after the permit has expired	This is met. <i>Arraigo</i> permits remain valid during unemployment and can be transitioned into a single permit if the applicant is registered with the public employment agency and actively job-seeking.

Selection of policy recommendations	Indicators	
Financial and practical support should be accessible during this time, at least on the same terms as nationals. Particular attention should be paid to situations where workers' housing was also provided by their employer.	2.8 Available financial and practical support while unemployed	This is not met. Receipt of unemployment benefits is conditional on the accrual of one year of work. This is the same as for nationals, but for those on <i>arraigo</i> permits, work done irregularly will not be counted towards this year. Since permits are intended to be for one year, it is impossible for migrant workers to claim unemployment benefits when job-seeking on their initial permit.
3. Equality and family unity		
Family unity: Migrant workers should be able to enjoy their family life as any other person. Restrictions on migrant workers with low income from bringing their families should be lifted	3.5 Possibilities to and restrictions on access to permits for family members	This is not met. Family reunification is contingent on one year of regular residence. Since permits are intended to be for one year, it is not possible for permit holders to bring or regularise their family members based on their initial permit, until it is renewed or they transition to another permit.
5. Social Inclusion		
Pathways to settlement: There should also be pathways to settlement after a number of years. All periods of residence should count towards long-term residence status.	5.1 Residence counts towards long-term residence or settled status	This is met. Residence under an <i>arraigo</i> permit counts towards long-term residence.





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for social justice.

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