

Key updates to Bermuda’s Work Permit Policy 2025

Briefing Summary: Effective 1 November 2025, Bermuda’s Department of Immigration has introduced significant revisions to its Work Permit Policy. These changes introduce new compliance obligations, clarify existing requirements, and may impact hiring practices and workforce planning. This briefing highlights the most important updates and their implications for employers and work permit holders.

Service Area: Employment, Pensions and Incentives

Location: Bermuda

Created Date: 28 October 2025

Changes to hiring processes

Reasons for not hiring local candidates (Section 1.6)

Employers must more clearly state in work permit applications why a Bermudian, spouse of Bermudian, or PRC holder was not selected over a work permit applicant, specifying the skills or experience lacking.

Further, the policy now specifies that employers will be expected to fill jobs in the following order: (i) Bermudians; (ii) Belongers (we understand this to mean naturalised British Overseas Territories Citizens); (iii) spouses of Belongers; (iv) spouses, widows, and widowers of Bermudians; (v) divorced parents of Bermudians; (vi) Permanent Resident’s Certificate holders; (vii) persons with a qualifying Bermudian connection (e.g. the parent of a Bermudian); (viii) other non-Bermudians. It is unclear how immigration will seek to enforce this hierarchy in practice.

Waivers of advertising (Section 1.14)

Automatic waivers now additionally apply to: presidents, managing directors, and directors (with submission of an org chart); resort hotel general managers; and fintech and family office permits. Where waivers aren’t granted automatically, they will be considered by the minister on merit.

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Employment contracts, accommodations and personal documents (Section 1.17)

Signed copies of employment contracts must be included with work permit applications, and any subsequent changes must be submitted to immigration.

Consulting with statutory bodies (Section 3.12)

Employers must now obtain council approval before applying for certain regulated roles, allowing up to 15 working days for response.

This requirement has the potential to significantly increase work permit turnaround times for regulated professionals including healthcare workers, architects, lawyers, accountants, engineers, and veterinarians.

Changes to entry requirements

Landing permits (1.23)

Landing permits will only be issued while work permit renewal applications are pending and will only be issued between one and three months before the expiry of the existing work permit.

Visiting Bermuda while application pending (Appendix II)

Except for renewals, applicants cannot visit Bermuda while their application is pending. Previously, passengers could visit Bermuda while their application was in process if they did not work.

Arriving without original documents (Appendix IV)

Passengers without original work permits or entry/re-entry documents may face penalties or refusal of entry. Previously, passengers would not be charged a fee if they carried a copy of their work permit (as opposed to the original).

Changes to requirements for existing work permit holders

Job changes (Section 1.10)

Work permit holders cannot change roles within the first year of a new permit or six months after renewal. The restriction on changing employers within the first two years of employment in Bermuda remains, except accountants may switch after 18 months.

Promotions (Section 4.2)

Posts must now be advertised internally before promoting a work permit holder, and evidence must show why locals were not suitable. Promotions are restricted during the first year of a new work permit or six months after renewal.

Notice of termination (Section 3.13)

Employers must now notify immigration of a work permit holder's termination within 14 working days from the date notice was given.

Previously, employers had to notify immigration within seven working days of the work permit holder's last day of employment.

Secondments (Section 7.15)

An employee may be permitted to temporarily work in a company associated with the one holding their work permit, subject to their obtaining a letter of permission from the minister.

Layoffs (Section 7.16)

If there is more than one person in the same or similar job category then the work permit policy states that work permit holders must be laid off first before Bermudians. Note there is no equivalent provision under the Employment Act 2000.

Changes to types of work permits

Restrictions on periodic work permits (Section 2.3)

Periodic permits are now limited to maintenance, warranty, training, or similar service agreements. Holders cannot fill permanent, short-term or part-time roles. We consider that individuals employed by overseas offices of Bermuda-based companies who are engaged on service agreements (such as employment contracts) may remain eligible for these permits.

Global entrepreneur work permit (Section 3.2)

The revised policy now clarifies that a global entrepreneur work permit is used where a business service company has a business relationship with a global investor who wishes to domicile a company in Bermuda. The applicant will need to satisfy the minister that they are a bona fide investor, and will be required to meet compliance or financial requirements or demonstrate proof of their ability to raise capital.

Intra-company transfers (Section 3.4)

The previous global work permit has been replaced by a modification to the standard work permit, providing for the automatic approval of permits where applicants are already employed overseas by group companies of their prospective Bermuda employers.

New business work permit (Section 3.5)

New exempted and 114B companies can now receive automatic approval of work permits within the first nine months (previously, six months) of obtaining a new business work permit, provided the first permit is applied for within the first year following the business's registration or incorporation. Employers will be required to provide additional business information to the minister if they anticipate needing more than five work permits within their first nine months of operation (previously ten work permits in six months).

Fintech business work permit (Section 3.6)

The policy now includes guidance on fintech business work permits, which are described as allowing fintech companies that are new to Bermuda to receive immediate approval of five work permits within the first six months of receiving their first fintech business work permit.

To qualify for a fintech business work permit, the employer must provide a certificate of incorporation for the new company. Ultimately, the minister will determine whether a company constitutes a fintech company.

Family office work permit (Section 3.7)

The revised policy introduces family office work permits, which are described as allowing family offices that are new to Bermuda to receive immediate approval of five work permits within the first six months of receiving their first family office work permit.

The policy defines a "family office" as *"a company, limited liability company, partnership or other legal entity incorporated, registered or established on behalf of, or for the benefit of, a single family (the family clients) for the purpose of managing the affairs of that family"*.

To qualify for a family office work permit, the employer must provide evidence of the incorporation, registration, or establishment of the new family office's legal entity.

Multiple employers (Section 4.6)

For corporate businesses, a work permit holder can only work for multiple employers if the worker is providing the same job functions for affiliated companies.

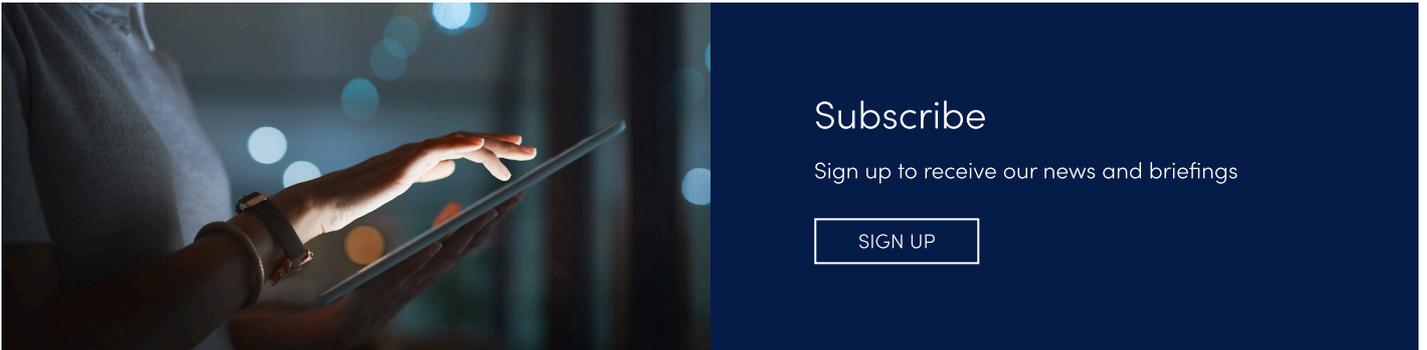
Graduate trainee and intern exchange (Section 7.5)

Employers hosting non-Bermudians as part of graduate trainee and internship programmes must submit proof that qualified local employees are being trained overseas as part of a reciprocal scheme.

For tailored advice or assistance navigating these changes, please contact our team. We are here to help you ensure compliance and adapt your workforce planning strategies effectively.

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