



Dear Readers,

as usual, we come to you with a selection of the most interesting HR news and topical issues of the past week.

SERVICE LENGTH REDEFINED: FINAL APPROVAL PENDING

The Polish Parliament has adopted a draft amendment to the Labour Code concerning service length, now submitted to the President for signature. This legislation introduces a significant change: periods worked under contracts based on the Civil Code and as a sole trader will now be included when calculating an individual's total length of service. The immediate practical effect of these changes is that employees will become eligible for more annual leave days, provided they properly document the relevant periods of prior work. The new law is anticipated to take effect in phases: at the beginning of 2026 for the public sector, and six months later for the private sector. Source: [here](#).

SENATE APPROVES END OF DUAL ARCHIVING FOR ELECTRONIC ZUS SUBMISSIONS

An amendment to the Social Insurance System Act was unanimously adopted by the Senate on 24 September 2025, successfully abolishing the requirement for the dual archiving of documents sent to the Social Insurance Institution (ZUS). This means entrepreneurs will no longer be obliged to archive physical documents with an employee's handwritten signature for five years, provided the original notification was sent digitally. Supported by both the Ministry of Family, Labour and Social Policy and ZUS, the amendment was considered necessary for rationalising administrative duties in line with Poland's full digitisation efforts. This adjustment represents a tangible reduction in red tape and aligns regulations with the actual practice of electronic document circulation. Link to the bill: [here](#).

NO INCREASE TO HEALTH INSURANCE CONTRIBUTIONS

During Friday's press conference, Prime Minister Donald Tusk firmly denied that the government has any plans to increase health insurance contributions. However, the Prime Minister acknowledged the need to secure additional financial support for the healthcare system. The government's strategy will focus on rationalising expenditure within the system and a thorough analysis of the effectiveness of existing financing mechanisms.

PRESIDENTIAL SIGNATURE AFFIRMS CHANGES TO UKRAINIAN ASSISTANCE ACT

The President has signed an amendment to the Act on assistance to Ukrainian citizens, introducing limits on benefits for individuals not working in Poland. Under the new regulations, access to various support programmes - including health, medicines, rehabilitation, and social welfare programmes - will now be conditional. To qualify for benefits, non-nationals must be earning at least 50% of the minimum wage in Poland. Crucially, the legislation also extends the validity of existing regulations governing the legality of Ukrainians' stay in Poland, which is now set for 4 March 2026. Link to the announcement: [here](#).

GOVERNMENT PRIORITISES NEW EMPLOYEE OMBUDSPERSON

The Ministry of Family, Labour and Social Policy has designated the establishment of the Ombudsperson for Workers' Rights institution as a key policy priority. This new office is intended to serve the interests of the millions of individuals employed in Poland. The Ministry asserts that the new Ombudsperson will provide additional assistance and necessary relief to existing bodies, such as the Commissioner for Human Rights and the National Labour Inspectorate, whose capacity to protect employee rights needs enhancing. The creation of this dedicated advocate is eagerly awaited by trade unions and employees across the country.

CJEU: DATA ACCESS REQUESTS EXPLOITING RIGHT TO COMPENSATION RULED ABUSIVE

The Advocate General of the Court of Justice of the European Union (CJEU) has issued an opinion that the mere fact a data subject has filed numerous claims alleging GDPR violations is not a sufficient reason to automatically refuse their request for data access. The GDPR provides a universal right to compensation for violations by a controller, meaning any refusal of a data access request is only permissible if the controller can prove that the request itself violates the law. Such violation occurs when the sole purpose of the request is to obtain compensation, perhaps by intentionally provoking the controller to refuse access. In such a case, even the first request may be deemed abusive if the controller can definitively demonstrate the data subject's intention was to exploit the right for financial gain.

Please do not hesitate to contact us: Karolina Kanclerz, attorney-at-law, partner, **Sławomir Paruch**, attorney-at-law, partner, and **Oskar Kwiatkowski**, attorney-at-law, lawyer.

UPCOMING EVENTS

- **Employees and social media: Monitoring candidates and employees – dos and don'ts** - 1 October 2025, 11:00-11:45, online. Register: [here](#).
- **Trust but check: B2B contracts under scrutiny - auditing compliance before the National Labour Inspectorate checks** - 2 October 2025, 11:00-11:45, online. Register: [here](#).
- **Workshop: Managing relations with trade unions. Post-notice union protection** - 2-3 October 2025, 9:00-14:30, online. Register: [here](#).
- **PCS MeetUp: The limits of loyalty – non-competition clauses during employment** - 6 October 2025, 11:00-11:30, online. Register: [here](#).