



Dear Readers,

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

NEW LAW REFORMING PIP IS EXPECTED

Last Tuesday, the Prime Minister announced that he does not accept the current draft of the bill reforming the National Labour Inspectorate (PIP). The proposal included an extension of PIP's powers, in particular the ability to reclassify civil law contracts and B2B arrangements as employment contracts by an administrative decision. In the Prime Minister's view, these powers went too far. He explained that granting officials such broad authority to decide on forms of employment could pose serious risks to the labour market. According to the latest statements, the government plans to prepare a new version of the bill. The revised rules are expected to protect workers while also securing full approval from the European Commission. The Prime Minister has stated that he wants to bring the matter to a conclusion efficiently. The final shape of the new regulations has not yet been published. Link to the legislative process: [here](#).

AMENDMENTS TO THE LABOUR CODE AND COMPANY SOCIAL BENEFITS FUND LAW SIGNED BY THE PRESIDENT

On Wednesday, the President signed amendments to the Labour Code and the Act on the Company Social Benefits Fund (ZFŚS). The changes are intended to speed up and simplify employer-employee processes through greater use of digital solutions. Documents that previously had to be in paper may now be provided electronically. This applies, among others, to information on workplace monitoring, the transfer of a workplace, consultation on terminations, and certain working-time requests. In addition, the amendments introduce a new deadline for the payment of compensation for unused annual leave. These changes provide a good opportunity to review and update internal HR documentation. Link to the legislative process: [here](#).

NEW LAW ON ZUS CERTIFICATION SYSTEM ALSO SIGNED BY THE PRESIDENT

On the same day, the President signed amendments to the act on social insurance system and other laws. The changes introduce new rules for verifying sick leaves and a new medical certification model within the Social Insurance Institution (ZUS). Link to the legislative process: [here](#).

ZUS: NO HEALTH INSURANCE CONTRIBUTION ON NON-COMPETE COMPENSATION AFTER REMOVAL FROM THE MANAGEMENT BOARD

ZUS has confirmed that payments made after a management role ends, which are not linked to any social insurance title, are not subject to health insurance contributions. The case involved a company that paid compensation for three months to a former management board member under a post-termination non-compete clause. The role had been performed based on an appointment, not an employment contract. ZUS concluded that a non-compete obligation is a separate civil law obligation, and that receiving such compensation alone does not create an obligation to pay health insurance contributions. ZUS interpretation of 11 December 2025 ref. no. DI/200000/43/1227/2025.

REFORM OF OVERTIME RULES FOR PART-TIME EMPLOYEES IS STALLING

The Ministry of Labour has announced plans for a comprehensive reform of overtime regulations to bring Polish law in line with rulings of the Court of Justice of the European Union. However, work on the changes has not yet started. According to supporters of the reform, the current rules result in unequal treatment of part-time employees. Under the Labour Code, overtime pay is due only after full-time working time limits are exceeded, not after exceeding the employee's agreed part-time hours. This has already been the seat of the CJEU several times. Link to the interpellation: [here](#).

OVER 37,000 REQUESTS TO INCLUDE CIVIL AND SELF-EMPLOYMENT PERIODS IN WORK HISTORY

Since January 1, new rules allow periods of work under civil law contracts and self-employment to be counted towards overall work history. ZUS confirms these periods by issuing official certificates. In just the first week of January, ZUS received over 37,000 requests for such certificates.

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, senior lawyer.

UPCOMING EVENTS

- **On unions with unions: Trade union membership under scrutiny – time for a review** - 13 January 2026, 11:00 – 11:45, online. Register: [here](#).
- **No because of GDPR!: Salary ranges, reports and earnings – transparency without myths** - 14 January 2026, 11:00 – 11:45, online. Register: [here](#).
- **Conference: 10 key changes in HR law for 2026** - 15 January 2026, 11:00 – 12:50, online. Register: [here](#).
- **PCS | MeetUp: Pay transparency - how to prepare your company for the new requirements** - 3 February 2026, 11:00 – 11:30, online. Register: [here](#).