

A woman with long dark hair, wearing a light grey jacket, is shown in profile from the chest up, looking out over a city skyline at night. The background is filled with blurred lights from buildings and streets, creating a bokeh effect. The overall color palette is cool, with blues and greys, accented by warm yellow and orange lights.

WHITE PAPER

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# Digitalisation of Travel Documents



## Digital Travel Documents to Increase Fluidity in the Schengen Area

This initiative is particularly compelling as it relates to the core of EU freedoms, citizens' right to free movement, as well as to the Schengen acquis, that allows all citizens of a Schengen country to travel within the Schengen borders without border checks. **EU citizens could cross Schengen borders with nothing else but their smartphones**, speeding up travellers' entry process to the EU by reducing the overall passport control and wait time. In addition to time efficiency, the initiative contributes to eradicating fraudulent travel documents. We thus believe that this initiative will help EU citizens exercise their rights and even support the EU mandate for a long-term digital future.

## EU Digital Wallet and Remote Identification

The idea behind remote identification is not new. The EU Digital Wallet proposal amending the eIDAS Regulation brings remote identification and authentication of EU citizens into reality through the ecosystem of a wallet. So-called trust providers within this ecosystem provide electronic services around digital certificates, timestamps, etc. to secure online transactions and **form a cycle of trust**. However, our experience in the implementation of the eIDAS Regulation teaches us that the digital identification of individuals poses a number of challenges, which are important to highlight here as they also concern digital travel documents.

## Digital Travel Document: Whose Job Is It?

One key issue is the definition of roles and responsibilities across the different parties. In the context of standardisation for machine readable documents, there usually are three main stakeholders: the **holder** of the document, the **verifier**, and the **issuing authority**. The immediate question is which of these stakeholders can be trusted to become the issuing authority for a digital travel document. Similar concerns arose around the EU Digital Wallet, the approach taken by the Architecture and Reference framework is that EU Digital Wallet Issuers should be Member States (or organisations mandated or recognised by Member States), thus responsible for ensuring compliance with the Regulation.

The initiative for digital travel documents could follow the same approach or define these responsibilities differently. For reasons of **transparency and accountability**, it must be clear from the start whether Government authorities or citizens are responsible for the digital travel document, as this carries numerous implications in the way the initiative is implemented.





## Data Controllership Hand-in-Hand with Responsibility and Accountability

The idea of **responsibility closely follows the notion of data controllership**, meaning that there must be an entity that decides why and how the digital travel document is used. On one hand, if a State entity is in charge, it further assumes oversight and protection responsibilities in the eyes of the law. At the same time, accusations could be made in the sense that citizens become deprived of control over their personal data. On the other hand, citizens should not have full control either, as sharing (or not) their identification data could inherently endanger the level of trust in the EU and the Schengen Area.

## Gain the Trust of Citizens for Technology Adoption

A digital travel document is not only complex in nature but also a highly political matter. An increasing number of citizens express their concern that extensive digitalisation of national services seems as if they are constantly monitored by some “Big Brother”. A digital travel document that is available on a smartphone can easily allow for physical tracking of an individual through GPS, which is a valid privacy concern. From a data protection stand-point, it further begs the question whether consent could be considered a valid legal basis for such personal data processing activity. In the context of this initiative, sensitive and biometric data will be automatically processed on a large scale,

with severe implications for individuals, in case their data are wrongfully processed or fall into the wrong hands. Following the example set in similar EU large-scale IT systems (SIS, VIS, Eurodac), the EU also needs to ensure that the data controller of this initiative has extended **transparency and scrutiny obligations**.

## Data Security Considerations or the Elephant in the Room

Security and privacy need to be taken into consideration already in the proposal phase of the initiative to ensure security- and privacy-by-design. Recent reports explain how biometric systems with remote identity verification have become targets of multiple sophisticated attacks, such as deepfakes, image or video injection attacks, etc. If all data are saved in a central location, it can be seen as a single point of failure. It should also be reminded here that the use of antivirus software is widespread for personal computers, but much less so on smartphones. In other words, smartphones can be vulnerable to cyberattacks and hackers can use smartphones as entry points to break-in and compromise the security of the entire solution. It should therefore become a priority to develop a solution for this initiative implementing **security as an integral part of the system** across its entire lifecycle



including protective measures, such as penetration testing or targeted audits to deter state-of-the-art attacks depending on the technological features of the solution.

## Technology Choices and Practical Limitations

With regard to the availability of a digital travel document, it is important to address concerns about accessing the document when the battery is low, or worse, when the phone is broken or lost, and the document needs to be securely transferred to a new device. Close attention must also be paid to the choice of technology. If for instance, Near Field Communication technology is chosen, it should guarantee not only **confidentiality, integrity and availability** of information, but also **interoperability** across different smartphones. The concern of interoperability extends to the use of digital travel documents across Member States. In line with the EU Digital Wallet proposal, Member States should ensure that their solutions are recognised by all other Member States, so that the citizens do not encounter any unnecessary delays at border crossing or other inconveniences.

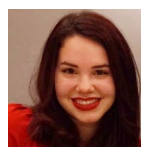
## A Solution for Every European Citizen

The use of digital travel documents should be **an easy option** for every European citizen, with particular care to availability to vulnerable groups and minorities based on their specific

needs. Although digital transformation is a key pillar of the EU, there are still citizens who struggle to fully embrace it in their daily lives. Accessibility and affordability of the solution need to be carefully addressed and become part of the digital design lifecycle to ensure that relevant social groups are part of the design phase.

Sopra Steria contributes with ideas and considerations to help shape this initiative in the best way for European citizens and draw the attention to potential privacy and security aspects. We strongly support the digital travel document initiative as it brings value to the lives of citizens. Security and data protection will ensure that the digital travel document serves its purpose efficiently and **ignites trust in European citizens to succeed in this digital leap.**

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