

Fragomen Wallet and the trusted data ecosystem across the EU Belgium

GENERAL INFORMATION	
Name of the organisation	FRAGOMEN GLOBAL LLP BELGIUM BRANCH
Type of organisation	Private sector (companies)
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Member State	Belgium
GOOD PRACTICE - GENERAL INFORMATION	
Title of the good practice	Fragomen Wallet and the trusted data ecosystem across the EU
Topic of the good practice	Digitalisation in Social Security Coordination
Geographical focus	Cross-country (please specify) All EU Member States.
Duration	Proof of concept - Q2 2024; Pilot testing on Production grade platform - Q3&Q4 2024.
Summary of the good practice	Fragomen has developed the Fragomen Wallet, a digital wallet that can accept and share a myriad of Verifiable Credentials (VCs), including social security (A1 certificate) VCs. A Verifiable Credential is a fraud-proof collection of data attributes, which are cryptographically signed. Sharing of the VC is instantiated by the Issuer generating a QR code that is scanned by the holder, which creates the encrypted channel between the relying party and the holder's wallet. The Fragomen Wallet is based on the EU

	<p>Single Digital Gateway Regulation¹ and aligns with the European Social Security Pass (ESSPASS) initiative of the European Commission.</p> <p>The Fragomen Wallet aims to improve compliance with EU objectives while facilitating legitimate business and free movement of workers. It creates a consistent framework to accommodate diversity in Member State approaches and enhances fair labour mobility across the EU.</p>
<p>OBJECTIVES AND ACTIVITIES</p>	
<p>Background/context</p>	<p>The Fragomen branch in Brussels is part of FRAGOMEN GLOBAL LLP; the largest specialised immigration firm in the world, representing 60% of the world’s most significant multinational corporations globally. They provide immigration and related services to clients in over 170 countries and manage more than 350,000 transactions worldwide. Fragomen is a leader in innovative technology for Posted Worker notification assessments and filings.</p> <p>The starting point for the Fragomen Wallet was the assumption that if a system is fast and easy to use, compliance will improve. The goal was to create a consistent framework, focusing on several key aspects:</p> <ul style="list-style-type: none"> ▶ Improved User Experience in the entire eco-system (for holder and consumer): Ensuring simplicity in accessing data and improving the overall user experience, as it enforces trust and frictionless movement of data between the wallet holder, issuer and the consumer of the VC; ▶ Comprehensive Analytics and GPS Monitoring: Providing comprehensive analytics, GPS monitoring, and a source of truth to produce evidence for audits. GPS tracking via a mobile app assists compliance but is set to protect privacy by tracking only if someone is within the national borders of a Member State.

¹ Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012 available here: [https://eurlex.europa.eu/eli/reg/2018/1724/oj/eng#:~:text=Regulation%20\(EU\)%202018%2F1724,\(Text%20with%20EEA%20relavance](https://eurlex.europa.eu/eli/reg/2018/1724/oj/eng#:~:text=Regulation%20(EU)%202018%2F1724,(Text%20with%20EEA%20relavance)

	<p>Fragomen's solution involves front-loading the technology with key data pools, including personal details, corporate data, and a knowledge library. This is complemented by secure information/document retention and integrated personal assessment.</p>
<p>Objectives</p>	<ul style="list-style-type: none"> ▶ Enhance Compliance: Improve compliance with EU objectives by utilizing Verifiable Credentials (VCs) to ensure the authenticity and integrity of social security data. This helps in reducing fraud and ensuring that only legitimate credentials are used. ▶ Facilitate Business and Staff Movement: Facilitate the legitimate business and movement of workers across the EU by providing a secure and efficient way to share and verify credentials. This reduces the administrative burden and speeds up the process of obtaining necessary approvals. ▶ Create a Consistent Framework: Develop a consistent framework for the issuance and verification of credentials that accommodates the diversity in Member State approaches. This ensures that local needs and sensitivities are recognised and addressed. ▶ Enhance Free Movement and Fair Labour Mobility: Promote the free movement and fair labour mobility across the EU by providing a reliable and secure method for verifying social security credentials. This supports the enforcement of EU laws in labour mobility and social security coordination. ▶ Improve User Experience: Ensure that the process of obtaining and sharing VCs is user-friendly and efficient. This includes simplifying the process of accessing data and improving the overall user experience. The user always keeps the control over his/her own data and decides when and with whom to share it.
<p>Main activities</p>	<ul style="list-style-type: none"> ▶ Development of the Fragomen Wallet: The wallet is designed to accept and share Verifiable Credentials (VCs). The first step is the onboarding process where the user will download the Fragomen Wallet and be

guided through an ID&V (Identity and Verification) process. This binds the wallet to the mobile device and the user to the wallet. The receiving of the VC occurs when an Issuer instantiates a connection request with the wallet holder (e.g. a QR code that the user scans). The issuer will generate a cryptographically signed VC which will be sent to the wallet holder. Upon acceptance of the request the VC will be stored in the holder's wallet. A consumer will make a request to the holder's wallet for a particular type of VC (e.g. an A1 certificate) and upon acceptance of that request the VC is shared. The data attributes are only shared with the consumer once the cryptographic signature has been validated and the VC has not been revoked.

- ▶ Automation of A1 applications and Schengen visa filings: We are working towards automating the process of applying for A1 certificates and Schengen visas, making it easier for users to comply with regulations and reducing the risk of non-compliance.
- ▶ Incorporation of UK Right to Work and Day One Compliance in Europe: The app will include features for conducting Right to Work and Day One Compliance checks, ensuring that users comply with employment regulations, and the results will be stored as a VC in the holder's wallet.
- ▶ Business Visitor Compliance: Fragomen emphasizes the importance of business visitor compliance, which involves monitoring and ensuring that business travellers comply with immigration regulations. This includes tracking and monitoring business visitors, ensuring they have the necessary work permits, and complying with the EU Posted Worker Directive.

Verifiable Credentials (VCs) and how they work:

- ▶ Issuance of Verifiable Credentials (VCs): The process begins with the issuance of VCs. These credentials include social security (A1 certificate) VCs, ensuring the authenticity and integrity of the data. The issuer generates a verifiable credential that includes

	<p>information related to the subject, the cryptographic algorithm and verification technique used, the nature and use case of the credential, and the status and expiry of the credential. The issuer then signs the VC with its private key and sends it to the user, who stores it in their digital wallet.</p> <ul style="list-style-type: none"> ▶ Presentation and Sharing of VCs: When the user needs to present the VC, they visit a third-party application (verifier) that supports VCs. The verifier generates a QR code that the user scans with their digital wallet. The verifier asks for the holder to present the credential. The wallet application handles the generation of a verifiable presentation (VP), which is a tamper-evident encoding of the credential generated using the subject's private key. The data attributes are only shared with the verifier once the cryptographic signature has been validated and the VC has not been revoked. ▶ Verification of VCs: The verifier retrieves the public keys of the subject and the Issuer from a trusted source, known as the Verifiable Data Registry. It then uses cryptographic techniques to verify that the VC was indeed signed by the issuer and the VP is signed by the wallet holder. This ensures that the data attributes are authentic and have not been tampered. ▶ These activities highlight the importance of Verifiable Credentials in ensuring compliance, enhancing free movement and fair labour mobility across the EU, and providing a secure and efficient method for verifying social security credentials.
<p>Did you previously provide information about this particular good practice under the European Platform tackling undeclared work?</p> <p>(if yes, is it possible to provide the year and the title of good practice or a link of the good practice in ELA Virtual library)</p>	<p>No.</p>

Funding/organisational resources	The firm has invested and continues to invest significantly in the technology for this initiative and has a vast team of FTEs dedicated to it.
PARTICIPATION	
Stakeholders involved	<ul style="list-style-type: none"> ▶ Member States administrations ▶ Private companies ▶ Universities ▶ Associations
Target groups	<ul style="list-style-type: none"> ▶ Mobile workers ▶ Business travellers
Final beneficiaries	<ul style="list-style-type: none"> ▶ Companies ▶ Governments ▶ Mobile workers and business travellers ▶ National administrations ▶ ELA ▶ European Commission
GOOD PRACTICE CRITERIA	
Achievements/ Results and outcomes (Alignment of good practice with the priorities of the Call (if not applicable, alignment with the field of EU labour mobility))	Development of the Fragomen Wallet has started early 2024 and is working as a proof of concept. It successfully demonstrates the ability to issue and manage Verifiable Credentials (VCs), including social security (A1 certificate) VCs, ensuring the authenticity and integrity of the data. Additionally, the Fragomen Wallet will be integrated with several Fragomen's existing technology solutions, such as the Posted Worker Notification assessments and filings. This integration will continue and ensures that the app can be seamlessly used alongside other compliance tools, providing a comprehensive solution for managing labour mobility and social security coordination.
Recognition (has this good practice been recognised on regional, national or EU level)	Fragomen's digital solutions have been presented at the ELA Tech Conferences 2022 and 2024 where they have illustrated the sophistication of the Fragomen GenAI

	<p>solution for an immigration, posted worker and social security assessment, as well as the automated filing of PWNs (Posted Worker Notifications) considering the diversity of the Member States' requirements.</p>
<p>Cost effectiveness (the degree to which the practice was successful in reaching objectives and producing clear and measurable outcomes at the lowest possible cost)</p>	<p>This practice helps solve fraud issues with A1 certificates without requiring significant investments from users. This makes it an attractive solution for both Member States administrations and governments and private sector companies.</p>
<p>Transferability (how the experience from this practice could be transferred to other contexts i.e. what would another Member State/group/sector need to have or put in place for this measure to be successful in their country/group/sector)</p>	<p>The Fragomen Wallet and the credentialization engine can be adopted by EU Member States as a tool for issuing, storing and consuming all types of credentials. This includes not only social security (A1 certificate) Verifiable Credentials (VCs) but also other types of credentials such as academic transcripts, employment references, and more. The wallet's flexibility and compliance with the EU Single Digital Gateway Regulation make it a versatile solution that can be integrated into various systems and processes across different sectors. By adopting the Fragomen Wallet and the credentialization engine, organisations can ensure the authenticity and integrity of the credentials they issue and manage, thereby enhancing compliance and reducing the risk of fraud.</p>
<p>Sustainability (how the practice is sustainable from a social, financial or environmental perspective)</p>	<p>This initiative is critical to Fragomen, as it enforces the objective of digitalisation and removes the need for hard copy documents, which is especially important while government processing is moving into a digital environment. As an example, in the legalisation of documents process it can be observed that the creation of a VC will remove multiple steps in the process and will have a huge environmental and financial impact. By using Digital Identity and the Wallet, there is the ability to leverage remote presentation of credentials without having to be physically present during presentation.</p>
<p>Innovativeness (innovative features of the good practice)</p>	<p>The concept of Digital Identity is not new, but the Decentralized Digital Identity is a rapidly developing ecosystem. Fragomen's platform supports multiple protocols and agents and facilitates the communication</p>

	<p>between various wallet holders in a way that ensures secure transfer of information and interoperability within the different ecosystems e.g. OIDC4VP/OIDC4VC/MDL. There are wallet providers that provide ID&V (Identification and Verification), but they have connected these together to bind the wallet to the person. (VCs are used more in EU at the individual level whereas MDL is used more in the US at the Government level e.g. Driver's Licenses.)</p>
<p>Digitalisation (Design, development and/or utilisation of digital tools, policies or plans for digitalisation, business processes and data digitalisation, data sharing digital initiatives, the use of digitalisation to facilitate the access to data in real time and detection of fraud and error, etc.)</p>	<p>The Fragomen Wallet, as well as the Verifiable Credentials technology are based on the EU Single Digital Gateway Regulation and in line with the European Social Security Pass (ESSPASS) initiative of the European Commission. This ensures that the app complies with the latest EU regulations and standards for digital identity and credential management, providing a secure and efficient method for verifying social security credentials.</p>