



A smarter Schengen

Digitalization and interoperability in the
EU Visa Strategy





Introduction

On January 29, 2026, the European Commission adopted its first-ever EU Visa Strategy¹, nicely complemented by a Recommendation to member states on attracting talent for Innovation². The new Strategy establishes a long-term strategy framework for Schengen visa policy, border management, and tools for its interoperability.

While the European Commission is proud to announce that the Schengen area is the world's most visited destination, they acknowledge a need to reform its visa rules and the existing mechanisms to better control compliance within the Schengen area. In this new vision, the outcomes will be found in two areas: the Schengen system's governance and the visa process itself. This article outlines the key proposed changes in each area and what they may mean in practice for organizations managing cross-border mobility.

The new interconnected border management system and its digitalization

Schengen allowance, EES, and ETIAS

Clearly identifying an existing compliance issue in visa-free nationals overstaying their authorized stay and remaining in the EU illegally, the European Commission is keen to ensure that their border management systems accurately monitor these stays. The problem arises, in part, due to the existence of bilateral agreements concluded by some Member States before the Schengen regulations entered into force. However, in practical terms, the majority of the issues arise due to a complex system of calculations that puts the onus on short-term travelers, monitored by only partially connected border management systems.

To solve the interconnectivity gap, a more advanced digital border management system is now in place with the introduction of the [Entry/Exit System \(EES\)](#) on a phased approach, which will be fully operational as of September 2026. Additionally, the long-awaited [European Travel Information and Authorization System \(ETIAS\)](#), expected to launch in 2026, will be essential to better filter any visa-free nationals traveling to the area.

▶ Our perspective

Despite these systems and their forthcoming interoperability, neither ETIAS nor EES allows travelers to check their remaining stay allowance. Providing such access would be technically straightforward and would significantly reduce

unintentional overstays, particularly among frequent business travelers with regional roles.

As a consequence, even with the new systems, travelers will need to continue manually monitoring their own allowance and follow a complex system of calculations to ensure they remain within the 90-day limit within a rolling 180-day period. This includes all the time spent in Schengen countries (not EU countries which are not part of Schengen) for business and tourism purposes, but excludes any time spent in a country in which third-country nationals hold a student, work, or residence permit.

▶ Our perspective

In the absence of a publicly accessible official stay calculation, travelers and their companies are compelled to rely on private tracking solutions to ensure compliance and prevent inadvertent overstays.

An interconnected framework

By 2028, the European Commission states that a fully interoperable framework of EU information systems will allow Member States to query multiple databases simultaneously through a single central search. This, among other objectives, aims to prevent the use of fraudulent work visas and residence cards to access the EU.



► Our perspective

For third-country nationals legally residing in the EU, this would be a welcome and much-needed improvement. However, it would still not address how intra-EU travel is accounted for. For example, when a traveler enters a Member State where they do not hold residency before moving on to another Member State where they do, authorities are unable to accurately count the number of days spent under the Schengen allowance.

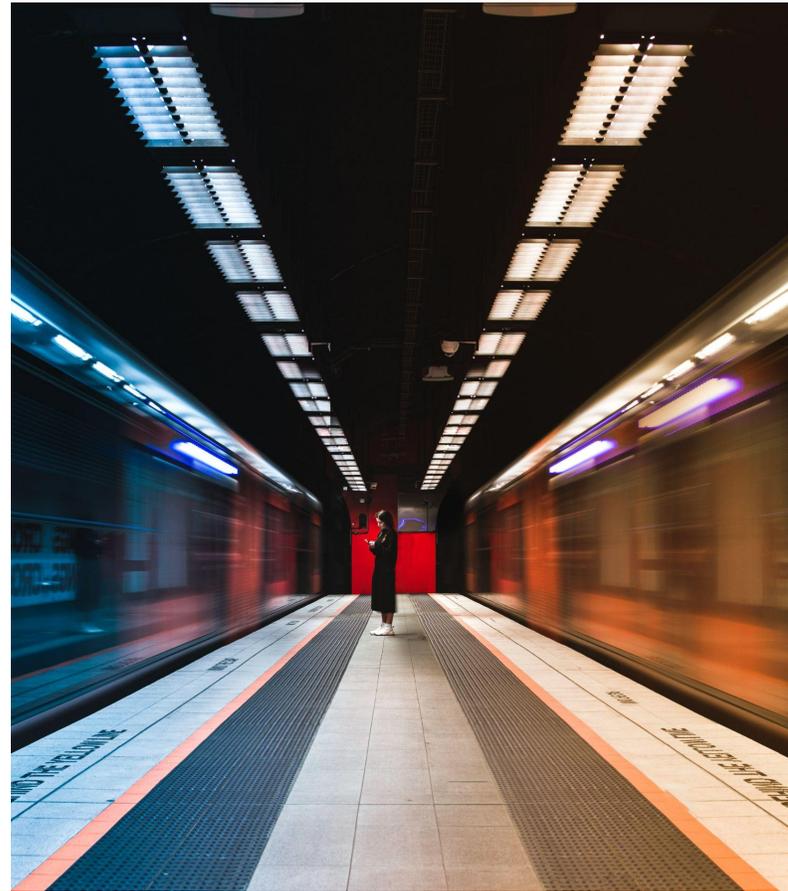
The future of enforcement and its exemptions

What is certain is that the new interconnected system will provide Member States and the European Commission with valuable insights into travel patterns, risk indicators, and potential abuse.

Combined with the stated objective of integrating artificial intelligence (AI) into data analysis, this will likely lead to increased audits, more frequent questioning at borders, and a higher risk of noncompliance findings for companies that lack robust business travel governance frameworks.

► Our perspective

As a result, companies operating in the EU will need precise visibility over traveler activity, trip duration, and full compliance with immigration, social security, and labor law obligations to avoid penalties.



In addition, the Commission is seeking to address the limitations of the 90-days-in-180 rule for regional roles or individuals who require extended stays without becoming residents, such as touring artists, athletes participating in sporting events, and specialists working on cross-border projects.

► Our perspective

While potential exemptions are still under discussion, a constructive approach could be to exclude time spent under work permit exemptions from the Schengen stay calculation.

Additionally, enhancing the intra-EU mobility possibilities under long-term permits (such as those under the EU Blue Card and EU ICT Directives) could allow third-country nationals to provide services across Member States for business purposes without being subject to Schengen stay allowance restrictions.



The new visa system

A differentiated visa treatment

Beyond the technological reforms outlined, the EU Visa Strategy signals a shift towards differentiated treatment of business travelers based on compliance history and organizational credibility. While detailed implementation will depend on the tripartite negotiations between the European Commission, the European Parliament, and the Council, the Commission's direction suggests that trusted companies and demonstrably compliant travelers may benefit from faster visa pathways and more predictable processing outcomes.

► Our perspective

For multinational organizations, this reflects an evolution in how mobility risk is assessed. Visa adjudication is increasingly extending beyond the individual applicant to consider the governance standards of the employer. Consistent documentation, clear articulation of business purpose, and structured internal oversight are likely to become indicators of credibility. Organizations with fragmented approval processes or inconsistent sponsorship practices may therefore encounter greater scrutiny, even where travel remains legitimate.

Mobility teams should view business travel, immigration governance and compliance as an operational capability. Establishing harmonized processes across HR, legal, and business units may reduce risk exposure while positioning organizations advantageously as differentiated treatment frameworks emerge.

Visa-free entry and targeted restrictive measures

Alongside facilitation measures for trusted travelers, the Strategy introduces a more assertive enforcement posture toward visa-free entry. In line with other countries, the Commission's proposals reference the potential use of targeted restrictive visa measures, enabling limitations on specific traveler categories or nationalities where risk indicators arise.

► Our perspective

For corporate mobility programs, this represents a shift in planning assumptions. Many organizations have relied on specific short-term work permit exemptions that, combined with visa-free access, could support short-term activities such as project oversight, technical deployments, and executive travel. Combined with a proposed common framework for criminal and administrative sanctions addressing the use of fraudulent documents (including entry bans), ensuring that travelers have the appropriate permits and documents for the activities they are going to perform is more critical than ever.

Mobility leaders should therefore avoid assuming continuity of visa-free access across all jurisdictions. Proactive monitoring of EU policy developments, combined with flexible travel planning and contingency visa pathways, will be essential to minimize disruption where eligibility rules evolve at short notice.

Multiple-entry visas and longer validity as a compliance incentive

The strategy also signals a willingness to expand the availability of multiple-entry visas, including exploration of validity periods extending beyond the current five-year framework for compliant applicants. For multinational employers managing frequent travel into the Schengen area, visas with extended validity could reduce administrative burdens and improve predictability for senior executives and specialized personnel.

However, extended validity is framed as a facilitative measure linked to demonstrated compliance rather than being a relaxation of oversight.





Authorities are expected to rely more heavily on historical travel behavior and data-driven indicators when assessing eligibility.

▶ Our perspective

Organizations that maintain accurate travel records, consistent documentation practices, and alignment between visa categories and business activities may therefore be better positioned to benefit from expanded validity options.

Consulate resourcing and operational consistency

The Commission also recognizes ongoing operational pressures within EU Member States' consulates, including appointment shortages and inconsistent processing timelines. Proposed improvements, including enhanced technical tools and additional resourcing, aim to deliver a more consistent application experience across the Schengen area.

▶ Our perspective

Conservative lead times, early appointment planning, and flexible project timelines will remain important as reforms are gradually implemented.

Digitalization of visa procedures

Furthermore, consistent with the broader digital transformation of EU border management, the Strategy outlines a longer-term objective to move towards fully digital visa applications and the eventual removal of physical visa labels. Although implementation will unfold gradually toward the latter part of the decade, the direction of travel is clear: visa processes will become increasingly integrated, automated, and data-driven.

▶ Our perspective

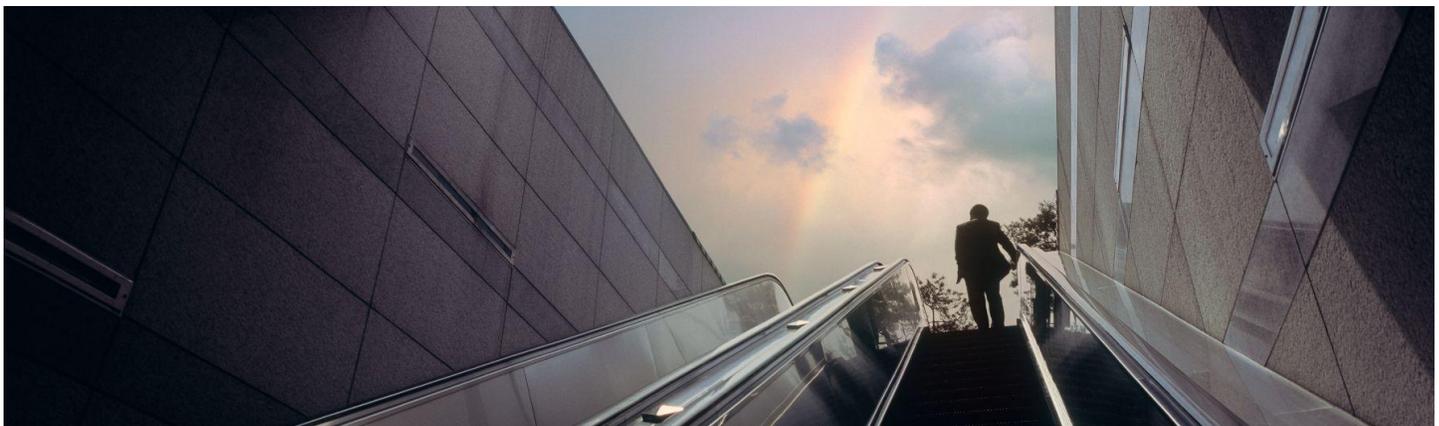
For corporate mobility teams, digitalization may simplify certain logistical steps while raising expectations around data accuracy and internal coordination. Automated checks across interconnected EU systems will reduce tolerance for discrepancies between application documents and employment information, requiring stronger alignment between HR, legal, and operational stakeholders before visa application submission.

Changes to the long-stay visa frameworks

Finally, although the Strategy primarily focuses on short-stay mobility, it also recognizes structural challenges within long-stay visa frameworks and signals potential reforms aimed at supporting skilled labor mobility.

▶ Our perspective

Discussions around more flexible work permits enabling short-term intra-EU work would be highly beneficial, as existing instruments, such as the EU ICT and the EU Blue Card intra-EU mobility, may not be functioning as effectively as intended.





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In summary, we can expect that in the next few years, the new EU Visa Strategy will position business travel, immigration compliance, and strong governance at the core of any global mobility and business travel programs, with digitalization, interconnectivity, enhanced border management controls, and a stronger focus on duty of care becoming essential pillars.

In light of the new European Asylum and Migration Management Strategy (which we will analyze in greater depth in an upcoming article), organizations should work closely with their specialist advisors to monitor negotiations with Member States, follow developments throughout the trilogue legislative process, and prepare early for practical implementation and governance before the measures enter into force over the coming years.

Ensuring that travelers are properly identified, their activities monitored, Schengen allowances tracked, and overall compliance and governance maintained within an appropriate risk management framework will be critical.

Contact us



Scherezade Maestre

Director, UK Solicitor & Spanish Lawyer

scherezade.maestre@vialto.com



Mark Cross

Director & US Attorney

mark.cross@vialto.com

Sources and references

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² https://home-affairs.ec.europa.eu/recommendation-attracting-talent-innovation_en