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Priority housing as ex-offenders’ key to a home: assessing the potential of Dutch certificates of housing urgency using Lipsky’s theory on street-level bureaucrats

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ABSTRACT
Having access to housing is considered a vital but also highly problematic aspect of ex-offenders’ reintegration process. To overcome the existing difficulties, Dutch ex-offenders are advised to apply for a so-called “certificate of housing urgency,” granting persons with urgent housing needs priority over others seeking affordable (social) housing. Using a holistic multimethod approach, this paper determines whether priority housing does indeed have the potential of becoming (part of) the solution to ex-offenders’ housing problems by examining the implementation of priority housing regulations in 45 Dutch municipalities. The study reveals that most regulations do not explicitly include or exclude ex-prisoners from receiving priority status. Whether an ex-offender qualifies for a priority status consequently often depends on decision-makers’ interpretation of the regulations. Interviews conducted with these decision-makers and analyzed in light of Michael Lipsky’s theory on street-level bureaucrats reveal that most enjoy a significant margin of discretion when assessing applications. As a result, ex-offenders’ chances of successfully obtaining a priority status primarily depend on the individual street-level bureaucrats’ style of rule application. It is concluded that whereas the Dutch priority housing system allows for tailored solutions to individual housing problems it offers little legal certainty to returning ex-offenders.

KEYWORDS
ex-offender; reintegration; priority housing; street-level bureaucrats; Lipsky; Netherlands

Introduction
“Picking up my life after detention really is a problem. Whether I try to find work or a home: whenever I apply for something or do anything I’m confronted with my time in prison. For example, because of my sentence I have spent a long time in detention, as a result of which I cannot afford my rent anymore. When applying for housing, people are shocked. “Is this your income?” they ask me with a frown. “But where do you live
“at the moment?” As soon as they hear me saying ‘[temporary housing]’, they say: “Well, then you have a roof over your head, right? You lack for nothing.”¹

— Albertina, an ex-offender from the Netherlands

According to Abraham Maslow’s Theory on Human Motivation, shelter – or housing² – is one of the most fundamental needs that has to be fulfilled before one can ultimately realize one’s full potential and “become everything one is capable of becoming” (Maslow, 1970, p. 46). A home is more than a mere place of shelter; it is a precondition for personal development. Offering a sense of belonging, comfort, and security, “[o]ur homes provide the backdrop for our lives” (Fox O’Mahony, 2007, p. 3). It is no wonder, then, that having access to stable housing is considered a basic necessity for an ex-offender’s successful return into society. Many studies have demonstrated the positive effect of adequate housing on ex-offenders’ recidivism risk (see, e.g., Baldry et al., 2006; Metraux & Culhane, 2004; Roman & Travis, 2006). A home not only facilitates social inclusion but is also crucial in organizing key aspects of life, such as securing an income (Bushway et al., 2007) and overcoming addictions (Nelson et al., 2011).

Notwithstanding the positive effect, a stable living situation has on the ex-offender’s recidivism risk, finding adequate housing continues to be “one of the most critical barriers to reentry” (Bradley et al., 2001, p. 2). Individuals leaving detention face a wide range of negative consequences following their conviction and as such experience serious difficulties on the housing market.³ Despite this, their problematic search for housing remains a largely “under-researched area of law and criminology” (Meijer et al., 2019, p. 3). The vast majority of studies on this topic moreover solely focus on the Anglo-Saxon jurisdictions, particularly the United States (see, e.g., Carey, 2004; Silva, 2015; Walter et al., 2017). Whereas the federal laws and regulations in the US are known to explicitly encourage⁴ or demand⁵ individuals with a certain criminal background to be excluded from public housing, the application and implications of the laws and policies in most continental European countries often are less evident. This is also the case in the Netherlands, where there are several policy schemes in place regarding ex-offenders’ search for housing but where the actual application of these arrangements remains rather obscure (Van Tongeren, 2020, pp. 2–3; Wensveen, 2020, pp. 8–9).

People with a criminal history generally lack sufficient income (More & Weijters, 2011, p. 47), making them rely heavily on the affordable housing market. In the Netherlands, affordable housing is primarily offered by social housing associations. While they are private, non-profit-making organizations they do have certain statutory duties including the responsibility to accommodate persons experiencing difficulties finding adequate housing.⁶ The revised Dutch Housing Act 2015 (Woningwet 2015...
moreover introduced the policy instrument of so-called “local performance agreements” (prestatieafspraken). These periodical agreements between the housing association, municipality, and tenants’ organizations establish how all parties should contribute to the realization of local social housing objectives, allowing the involvement of municipalities and tenants in the housing association’s social housing policy.7

While approximately 75% of the total rental housing stock in the Netherlands is owned by social housing associations, significant housing shortages remain.8 Currently, waiting lists with lengths of up to nine years are not uncommon in certain urban areas (Kromhout & Wittkamper, 2019). To still be able to provide affordable housing to those with serious housing needs, municipalities in the Netherlands may create a system of priority housing: by issuing certificates of housing urgency, certain categories of home seekers can circumvent the waiting lists. Since 2017, the Dutch Custodial Institutions Agency (Dienst Justitiële Inrichtingen, DJI) explicitly refers to these certificates as one of two options for ex-offenders to find stable housing after leaving detention (DJI, 2017, p. 21).9

Despite priority housing being suggested as a possible solution to ex-offenders’ immediate housing problem, little is known about (the effectiveness of) this strategy. It is unclear, for example, how priority housing is organized and implemented throughout the country and whether ex-offenders can indeed successfully apply for a certificate of housing urgency. It also remains unknown how the decision-makers decide to either grant an applicant a priority status or reject his or her application. In short, the Dutch system of priority housing and its application remains virtually unexplored and unexplained: it is a black box.

Using the Netherlands as an illustrative case study, this paper aims to determine whether priority housing has indeed the potential of becoming part of the solution to ex-offenders’ problematic search for housing. To answer this question, an assessment of the written priority housing rules and regulations alone does not suffice; to determine the extent to which ex-offenders qualify for priority status, it is necessary to analyze the interpretation and applications of these rules and regulations as well. This study, therefore, adopted a holistic, two-stage multimethod approach, providing not only the necessary comprehensive understanding of the Dutch “law on the books” but also offering an in-depth analysis of the “law in practice” by studying the application of the priority housing rules and regulations by those front line officers responsible for assessing the priority applications.

The following section first introduces Lipsky’s concept of street-level bureaucracy as a theoretical framework used to analyze and understand the priority housing decision-making process. Next, section Materials and methods further explains the study’s multimethod approach. Section
Priority housing regulations in 45 Dutch municipalities then briefly describes the applicable legal framework and discusses the outcomes of a systematic content analysis regarding the priority housing arrangements in 45 Dutch municipalities. Section Interviewing street-level bureaucrats focuses on decision-makers’ role in implementing and shaping the priority housing regulations and policies. This section is primarily of an empirical nature: it determines how Dutch decision-makers use their relatively independent position to assess individual housing applications and what this entails for ex-offenders pursuing a priority status. Section Conclusions concludes the paper.

**Theoretical framework: Lipsky’s street-level bureaucrats**

In the Netherlands, individuals applying for a priority status do so by requesting a certificate of housing urgency from the municipality or the local housing association. Whereas the municipal’s executive board is formally responsible for deciding upon these applications, they are usually not assessed by them. Charged with determining an applicant’s eligibility for a priority status are those employees who are working on the organization’s frontline and who are often referred to as *street-level bureaucrats*, a term first coined by Michael Lipsky in his 1969 paper *Toward a Theory of Street-level Bureaucracy*.

Lipsky introduced the concept of street-level bureaucrats to describe “those men and women who, in their face-to-face encounters with citizens ‘represent’ government to people” (Lipsky, 1969, p. 1). Lipsky defines street-level bureaucrats as public employees working on the frontline whose jobs require them to constantly and directly interact with individual citizens. Responsible for determining the allocation of government sanctions as well as benefits, such as social security, healthcare benefits, and (public) housing support, their decisions have a potentially significant impact on citizens’ daily lives (Lipsky, 1969, p. 2).¹⁰

In addition to their direct client contact and the impact of their decisions, street-level bureaucrats are characterized by the level of freedom they enjoy when determining whether a citizen qualifies for a government benefit or sanction. Not only do they possess a certain level of autonomy, but they also enjoy a significant degree of discretion when assessing individual cases. The ability to interpret and sometimes deviate¹¹ from rules and policy guidelines and to give special consideration to a citizen’s personal situation can help street-level bureaucrats reach decisions when this is particularly difficult. When an ex-offender with urgent housing needs applies for a priority status but does not meet all legal requirements, the decision-maker may sometimes use his or her discretionary power to
nevertheless issue a certificate of housing urgency, thus preventing the ex-offender from becoming or staying homeless.

Yet while their margin of discretion allows street-level bureaucrats to take into account their applicant’s personal circumstances, it may also place them in a difficult position. Despite their relatively autonomous position, street-level bureaucrats work for governmental organizations that are expected by the public to treat every individual equally and limit the number of exceptions to the rules. In addition to their caseload usually preventing them from solely making tailor-made decisions, street-level bureaucrats are required to ensure a certain uniformity when interpreting and applying the rules. As a result, street-level bureaucrats often find themselves caught between a rock and a hard place: on the one hand, they have to treat all citizens alike in their government claims, while on the other they have to respond to the individual case before them.

Observing how street-level bureaucrats aim to resolve this dilemma not only offers valuable insights into the mechanisms behind the implementation of the policy rules and guidelines in individual cases but also provides a better understanding of the general interpretation of these rules and regulations. As decision-making professionals, street-level bureaucrats not only use their discretion to interpret and implement the rules and guidelines adopted by the policymakers but help shape these policies as well. According to Lipsky, they “exercise wide discretion in decisions about citizens with whom they interact. Then, when taken in concert, their actions add up to agency behavior” (Lipsky, 1980, p. 13). As such, the decisions and routines of street-level bureaucrats eventually “become the public policies they carry out” (Lipsky, 1980, p. xii).

How Dutch decision-makers interpret the priority housing eligibility criteria and so influence ex-offenders’ chances of finding affordable housing is addressed later in this paper. Before being able to do so, it is necessary to establish the applicable legal framework and to assess the priority housing regulations in the 45 selected municipalities, using doctrinal legal research and systematic content analysis. First, however, the study’s multimethod approach is elaborated upon.

**Materials and methods**

As stated in the paper’s introduction, the primary objective of this study is to deepen our understanding of priority housing as a possible means for ex-offenders to find stable housing. By reviewing local regulations, assessing the roles of organizations involved, and analyzing decision-making mechanisms using Lipsky’s theory on *street-level bureaucrats* it prides to open the black box of priority housing in the Netherlands. Examining the law both,
such as it is and how it is being applied by front line decision-makers, this paper presents the first comprehensive study considering Dutch certificates of housing urgency as an instrument for ex-offenders’ search for adequate accommodation.

To meet its purpose, the study employed a multimethod approach consisting of qualitative empirical research supported by doctrinal legal methods and systematic content analysis. Firstly, doctrinal legal research has been used to gain a thorough understanding of the “law in the books” and to explain what the law is, why it is as it is and what its potential consequences are (Hutchinson & Duncan, 2012). The doctrinal legal analysis conducted in this study concentrated on Dutch national law, parliamentary documents, and local legislation.

To complement the doctrinal legal study, quantitative research was carried out, consisting of a systematic content analysis of local Housing Regulations (Huisvestingsverordeningen) and policy documents of 45 Dutch municipalities. This analysis aimed to discover how many of these municipalities have a system of priority housing in place and to what extent ex-offenders’ urgent housing needs are taken into account. Systematic content analysis has been described as a “systematic and replicable technique applied to analyze a variety of texts, ranging from interview transcripts to legal texts, such as case law and legislation” (Salehijam, 2018, p. 35). It allows for compressing “many words of texts into fewer content categories based on explicit rules of coding” (Hutchinson & Burns, 2009, p. 30). To contextualize the collected data, short telephone interviews were conducted with front office employees of housing associations in eighteen municipalities.

The sample of 45 municipalities firstly comprises the 44 most populous municipalities in the Netherlands, 32 of which have over 100,000 residents. This selection of 44 municipalities is primarily based on two considerations. Firstly, together these municipalities have a total of 7.4 million inhabitants, or more than 43% of the total Dutch population (which in 2021 is about seventeen million). As such, these municipalities face the most returning ex-offenders in both an absolute and a relative sense: 14,608 or more than 70% of the registered ex-offenders eligible for aftercare in 2017 returned to these municipalities. A second reason for choosing this sample is the municipalities’ even spread across the country, covering eleven of the twelve Dutch provinces. To include the province of Zeeland in the sample as well, its capital of Middelburg has been added, bringing the selection of studied municipalities on 45 (see Appendix A).

After finalizing the doctrinal legal analysis and the systematic content analysis, semi-structured interviews were conducted with professionals and policymakers involved with the housing of ex-offenders with priority needs.
Respondents were recruited either by directly contacting them via telephone, email, or their LinkedIn profile, or they were put forward by their respective organizations. This resulted in 28 interviews with thirteen representatives of organizations involved with the assessment of priority applications, nine employees of housing associations, and three municipal officials involved in local policymaking. Lastly, representatives of non-profit organizations providing shelter and housing support to ex-offenders and operating either on a national, regional, or local level were interviewed (see Appendix B for the list of respondents). All respondents were informed about the aim and design of the study and the use of their data before being interviewed. During the interview, they were first asked several general questions concerning, for instance, their specific expertise, their decision-making authority, or – if applicable – the composition, organization, and procedures of the urgency committee they represented. The interview then covered topics, such as information collection and sharing, the interpretation of legal criteria, the decision-making process, and whether and how the interests of other tenants and neighbors were being taken into consideration. Lastly, respondents were asked to reflect upon the local priority housing system, identifying both positive aspects as well as problem areas.

All interviews were recorded and transcribed and in some cases additional information was requested and received through email. On one occasion, a follow-up interview was conducted. The interviews were coded manually, with the codes being determined after completing the interviews. In February 2020, the findings were discussed during a focus group meeting with eight randomly selected interviewees and policy advisors of the Association of Netherlands Municipalities (see Appendix C for a list of participants).

**Priority housing regulations in 45 Dutch municipalities**

In the Netherlands, priority housing is not organized on a national level. Instead, each of the 355 municipalities is largely free to adopt its system of prioritized housing if it deems this necessary. As a result, the framework(s) in which Dutch decision-making professionals operate may vary substantially. This section presents the outcomes of the doctrinal legal study and the systematic content analysis. It determines how the 45 municipalities under review have used their legislative freedom to implement priority housing regulations and to what extent this has led to local variation. It furthermore establishes what these differences entail for the street-level bureaucrat responsible for determining an applicant’s eligibility for a priority
status as well as for the ex-offender trying to obtain a certificate of housing urgency.

**Legal framework**

As discussed above, affordable housing in the Netherlands is predominantly the responsibility of housing associations. According to the Dutch Housing Act 2015, these associations are responsible for building, maintaining, and providing social housing. In addition to the Housing Act 2015 regulating the position and finances of the housing associations, the Housing Allocation Act 2014 (*Huisvestingswet 2014*) sets out rules concerning the fair distribution and allocation of social housing (Vols & De Boer, 2018). Among other things, it enables municipal councils to establish local Housing Regulations if the council deems this necessary because of, for instance, the existence of a housing shortage.

In these Housing Regulations, the municipal council may establish a system of priority housing, granting persons with urgent housing needs the possibility to obtain a certificate of housing urgency. Using this certificate, one receives (a certain level of) priority over others on the housing associations’ waiting list, although, as shown in more detail below, the board often entrusts a specific person, an internal committee, or even an external organization with the decision-making on its behalf.

Once a system of priority housing is in place, the Housing Allocation Act prescribes that at least two categories of persons with urgent housing needs should receive a certificate of housing urgency: individuals who are staying in a shelter for victims of domestic violence and persons providing or receiving informal care (*mantelzorg*). The municipal council may add other groups of individuals with urgent housing needs to this list as well. Usually, persons whose medical situation requires them to move into a different, more suitable home (“medical urgency”) are included as a category, as well as those whose social situation requires them to do so (“social urgency”). Lastly, as shown below, several municipalities have included individuals leaving detention as a separate, stand-alone category eligible for priority housing.

**Results of the systematic content analysis**

The above reveals that municipal councils in the Netherlands enjoy much freedom when drafting up their priority housing arrangements. To determine how they exercise this freedom local legislation and relevant policy documents of 45 municipalities have been collected and systematically analyzed. From this quantitative assessment first of all follows that not all municipalities have established a system of priority housing. Of the 45
reviewed municipalities, 29 – about 65% – were found to have implemented Housing Regulations; 25 of these include a system of priority housing. This means that in just over half of the total number of considered municipalities (56%) people with urgent housing needs can request a certificate of housing urgency (see Table 1).

Considering the (affordable) housing shortages in the Netherlands – especially in the more populated areas included in the study’s sample – and the fact that priority housing is regarded by the relevant Dutch institutions as a tool for ex-offenders to find suitable accommodation, this number appeared lower than expected. An examination of several housing associations’ websites, however, revealed that in areas where the local Housing Regulations do not provide for the use of certificates of housing urgency, a system of priority housing may nevertheless exist. The systematic content analysis was therefore expanded to include policy documents of all housing associations operating in the 45 studied municipalities and providing some form of priority housing. This second round of data collection and assessment revealed that in seventeen municipalities – about 38% of the total sample – priority housing is not provided for by the municipality but is organized by the local housing association(s). In one municipality, two separate priority housing arrangements even co-exist one established by the municipal council and one created by the local housing association. In this municipality, it appears that the two arrangements complement each other.

To better understand housing associations’ development of priority housing in seventeen of the assessed areas, telephone interviews were conducted with their front office employees. This revealed that although in these areas priority housing is not subject to public regulation by the municipal council, the local administration did collaborate with the housing association(s) to establish the categories of households qualifying for priority status and to determine the eligibility criteria. Whether any subsequent policy changes are also implemented in consultation with the local authorities differs per housing association. Some associations indicated that any policy adjustments were based on “new insights” without these first being discussed with the administrative authorities, while others confirmed that the municipality was involved in policy evaluations as well. It seems that in these areas priority housing can be seen as a form of public-private cooperation (see Cafaggi & Renda, 2012) rather than being either an exclusively public or private affair. 22 Only in the municipality where public and private

| Priority housing in municipal housing regulation | 25 | 55.6% |
| Priority housing provided for by housing association | 17 | 37.8% |
| Public and private priority housing arrangements co-existing | 1 | 2.2% |
| No priority housing | 2 | 4.4% |
| Total number of municipalities in sample | 45 | 100.0% |
arrangements exist next to each other did the housing association employees state that their priority housing scheme was created without any involvement of the local administration.23

The systematic content analysis furthermore revealed that most regulations and policy documents do not explicitly refer to ex-offenders as a specific target group. In fourteen of the priority housing arrangements (33%), individuals with a criminal background are explicitly mentioned. In eight arrangements (19%) they are categorized as being eligible for a priority housing status, whereas in four areas (9%) losing one’s home due to detention is in itself characterized as not constituting an urgent housing problem. In two municipalities (5%), “persons leaving detention” are categorically excluded from obtaining a certificate of housing urgency.

During the study’s empirical phase, respondents were asked why ex-offenders are or are not mentioned in the local regulations. Respondent 5 stated that “there are thousand-and-one target groups (…) who need housing as soon as possible, but there are simply too few houses available,” to which respondent 6 from the same area added that “politically, it’s very risky to arrange something for an ex-offender.” Respondent 7, however, said that the policymakers in her area “find it logical that these individuals, taking into account their situation, qualify for priority housing.” These statements show that the question of whether or not to include ex-offenders as part of the priority housing arrangements’ target group is ultimately a political one, to be answered by the policymakers in the area, including the democratically chosen municipal council responsible for drafting the Housing Regulations.

The above shows that in almost all of the assessed municipalities (95%) some form of regulation exists concerning persons with urgent housing needs, either created by the municipal council or together with the local housing associations (see Table 1). Table 2, however, indicates that even though it is possible for vulnerable households to apply for a priority status in these municipalities, in only one in eight areas are persons leaving detention explicitly qualified as being eligible for a certificate of housing urgency. In the areas where ex-offenders are not specifically mentioned in the priority housing arrangement, it remains unclear to what extent they may qualify for priority status.

To determine whether a certificate of housing urgency is indeed an effective instrument for ex-offenders to find stable housing – as suggested by the Dutch Custodial Institutions Agency – it is necessary to not only

<table>
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<th>Table 2. Number of priority housing schemes referring to applicants’ criminal backgrounds.</th>
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<td>Number of priority housing schemes without explicit referral to ex-offenders’ eligibility</td>
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<tr>
<td>Arrangements explicitly including ex-offenders as target group</td>
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<tr>
<td>Arrangements qualifying loss of a home due to detention in itself not an urgent housing problem</td>
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<tr>
<td>Arrangements explicitly excluding “persons leaving detention”</td>
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<tr>
<td>Total number of priority housing schemes in sample</td>
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review the local regulations, the law in the books, but also to assess the law in action and to analyze how individual decision-makers fulfill their decision-making responsibility. Before presenting the results from the qualitative research, however, it is first revealed to what extent local priority housing regulations vary from one another and how this variation may affect street-level bureaucrats’ role as decision-makers.

**A further analysis of local arrangements**

What strikes the most when examining Dutch priority housing regulations in more detail is that whereas these regulations share certain core characteristics, they also display significant differences. First of all, local priority housing schemes range from rather generally formulated ones using broadly phrased eligibility criteria to very specific and detailed arrangements. Some regulations are even so specific that they provide for a separate priority “track” for certain target groups, for instance, ex-offenders. In five areas in the Netherlands, persons leaving detention may qualify for a special certificate of housing urgency when in addition to their dire housing situation they need (housing) support. They are granted a priority status when an (external) organization is willing to provide such support. One municipality even provides for the necessary case management by a special organization if the ex-offender does not yet receive any assistance.

The second finding of variation concerns the actors responsible for assessing and deciding upon the applications. As mentioned above, these street-level bureaucrats are responsible for interpreting the often broadly formulated eligibility criteria. Whereas eight of the studied areas have placed this responsibility on individual municipal officials or housing association employees, 31 municipalities work with a committee comprising three or more members. These so-called “urgency committees” (urgentiecommissies) are established to assess the applications for housing priority and to advise the municipality’s executive board or the housing association deciding upon the application. Even though the committees’ advice is often binding, several Housing Regulations have formally granted them the role of decision-makers as well.

As illustrated by Figure 1, the majority of urgency committees (17 of 31) consist of members usually nominated and selected by the municipality and the local housing association(s). These committees are always chaired by an independent chairperson. The assessment of priority housing applications may, however, also have been entirely outsourced to a private organization – this is the case in 14 of the 31 studied areas. One such service-providing organization works for 38 municipalities of which five are included in this study’s sample. A second organization is active in four of the studied municipalities.
A last distinct variation in Dutch systems of priority housing concerns the blurring of the boundaries of public and private regulation. It was already noted that local authorities in about a third of the studied municipalities worked together with the local housing association(s) in drawing up a priority housing arrangement. However, that the issuing of certificates of housing urgency in the Netherlands is not a purely public affair also follows from the analysis of the individual priority housing regulations. In 21 of the studied areas, the applications for a certificate of housing urgency are assessed predominantly by private actors, in 6 areas this is a joint responsibility of private and public actors, and in 9 municipalities the decision-making process is predominantly assigned to public employees.25

Interviewing street-level bureaucrats

The above shows that in the Netherlands a great variety exists in local priority housing schemes. In areas in which ex-offenders are not explicitly mentioned in the regulations, it depends on the decision-makers’ interpretation of the eligibility criteria whether or not one qualifies for priority status. By interviewing these decision-makers – and others closely involved with the housing of ex-offenders using certificates of housing urgency – it was possible to determine how the relevant eligibility criteria are interpreted and what this means for ex-offenders seeking a priority status. What is more, using Michael Lipsky’s theory on street-level bureaucracy as a lens through which to analyze the collected data moreover allows for a better understanding of the decision-making process as a whole.

Dutch decision-makers as street-level bureaucrats

Earlier on, the three basic characteristics possessed by street-level bureaucrats were discussed. Street-level bureaucrats frequently interact with their
clients, their decisions potentially have a significant impact on citizens’ daily lives, and they occupy a fairly autonomous position within their bureaucratic structure, enjoying discretion when deciding upon the cases before them. These traits can be identified when observing Dutch decision-makers involved with priority housing as well. Firstly, it follows from the conducted interviews that client interaction is essential to most professionals because it enables them to fully assess the applicant’s personal situation. Often, an admission interview is held with the client and – if applicable – his or her support organization to obtain a complete and thorough picture of one’s personal situation and specific housing needs. Secondly, the decision of whether to grant a priority status can be considered as potentially having considerable significance to the applicant’s daily life: it may be the key to end his or her housing problems. Finally, Dutch decision-makers involved with the issuing of certificates of housing urgency work in relative independence from their management and organization, even though the level of autonomy and discretion may vary depending on the specific priority housing system. This is further illustrated below.

The preceding section shows that a variety of actors is involved with the priority housing decision-making process, ranging from individual municipal officials or housing association employees to urgency committees. Whoever is responsible for assessing the priority housing applications is usually kept at an arm’s distance from the corresponding organization. As was already observed by Lipsky, street-level bureaucrats “are usually free from direct observation by supervisors or the general public” (Lipsky, 1980, p. 85). Even if an urgency committee consists of municipal and housing association workers operating in a hierarchical setting there is often an independent chairperson from outside these organization’s ensuring a certain level of autonomy. In the case of the private service-providing organizations discussed above, all members are independently selected and the assessment procedure is entirely free from interference from the municipality or the housing association. The street-level bureaucrats consequently all enjoy a certain level of autonomy, despite different actors being involved in the decision-making process.

In addition to their autonomy being an element of street-level bureaucrats’ independent position, Dutch decision-making professionals are granted a considerable margin of discretion as well. According to Lipsky:

> while eligibility for public service benefits often may seem cut-and-dried, a considerable part of eligibility is in fact problematic. Rules and regulations provide only a measure of guidance in determining eligibility. This may be because discretion must be used in determining eligibility for the presenting situation. – Lipsky, 1980, p. 60

How street-level bureaucrats use their margin of discretion depends on their own, personal view of their position as a decision-maker. May and
Winter (2000) in their study on the regulatory enforcement of Danish agro-environmental inspection argue that street-level bureaucrats may adopt different styles of rule application. According to the researchers, the approach preferred by the individual inspector is determined by two underlying dimensions of enforcement styles. These dimensions are the street-level bureaucrat’s degree of formalism – or rule adherence – and the degree of coercion in his or her dealings with regulated parties (May & Winter, 2000, p. 147). By determining the position the inspector takes in within these two dimensions, the researchers were able to characterize his or her style of enforcement.27

When studying Dutch professionals involved with priority housing it is the first dimension – the degree of formalism – that is worth considering (see Figure 2). It ranges from uniform, impartial, and rigid rule adherence (“equity”) to a more lenient, compassionate, and flexible approach (“responsiveness”). The manner in which street-level bureaucrats use their margin of discretion depends on where they place themselves on this scale.

The conducted interviews first of all showed that nearly all respondents have the possibility to deviate from the criteria laid down in the regulations and policy guidelines. Especially those working with more general terms and criteria appear to enjoy much freedom when assessing the applications. From the interviews, it moreover appeared as if most respondents also do use this freedom to take in a more flexible position toward applicants with urgent housing needs. Respondent 25, for example, stated that the criteria defined in local policy guidelines are only “minimum criteria”: if she believes that the applicant risks becoming homeless for valid reasons, she will grant a priority status despite the applicant not fulfilling all criteria.

“These criteria are seen more as a framework than as a strict guideline. (...) We communicate the conditions as absolute conditions, but in practice these aren’t so absolute.” – Respondent 25

Only one respondent appeared to have adopted a strictly formalistic style of applying the local criteria. He argued that he and his colleagues do not have any margin of appreciation when assessing priority housing applications and that they lack the possibility to deviate from the rules even when the applicant’s personal situation may demand this.

![Figure 2. Street-level bureaucrats’ style of rule application, ranging from uniform, impartial, and rigid application of rules (“equity”) to a lenient, flexible and adaptable style (“responsiveness”).](image-url)
"[A]pplications are solely tested against [four objective] criteria and specific personal reasons for a priority status are not taken into account." – Respondent 18

At first glance, then, it seems that the majority of the interviewed professionals favor a more lenient and flexible approach over a uniform and rigid style of rule application. However, when specifically asked about how they use their margin of discretion most respondents claimed they only have little space to deviate from the rules and solely do so in cases in which this is necessary to avert severe hardship. This is in line with Lipsky’s observation that “[s]treet-level bureaucrats often believe firmly that they treat all clients alike” (Lipsky, 1980, p. 112). The decision-makers participating in the focus group meeting furthermore asserted that the first and foremost rely on the regulations and policy guidelines and only in a smaller part on their expertise, experience, and judgment.

It appeared as if the street-level bureaucrats involved with priority housing generally “downgrade” their discretionary position. This downgrading may be explained as a “common way to limit responsibility”: "[w]orkers seek to deny they have influence, are free to make decisions, or offer service alternatives [because] strict adherence to rules (…) provide[s] workers with defenses against the possibility that they might be able to act more as clients would wish. ‘That’s the way things are,’ ‘It’s the law,’ and other rationalizations not only protect workers from client pressures, but also protect them from confronting their own shortcomings as participants in public service work” – Lipsky, 1980, p. 149

It was only when it was suggested to the focus group meeting participants that municipalities should introduce common guidelines to uniformize local decision-making processes that they emphasized the importance of their discretionary powers, arguing that as decision-makers they need a certain margin of discretion to be able to make moral judgments and deliver personalized solutions to the individual’s housing problems. Whereas the professionals generally pointed out that they aim to apply the rules uniformly, they at the same time expressed the importance of being able to be responsive to someone’s personal circumstances. It consequently seems that the decision-makers resolve the dilemma identified by Lipsky by using a combination of generally rigid rule adherence and – if they deem this absolutely necessary in light of the applicant’s urgent housing needs – flexibility.

It is important to note that when considering Dutch priority housing professionals’ style of rule application it should be taken into account that these street-level bureaucrats do not work as isolated individuals. Whereas Lipsky refers to street-level bureaucrats as individual decision-makers, most priority housing applications in the Netherlands are assessed and decided upon by committees or in otherwise close consultation with colleagues (see Figure 1). Lipsky already recognized the importance of these bureaucratic
relationships on the level of the individual professional, stating that “[t]he peer structure in street-level bureaucracies is often quite strong. Street-level bureaucrats work in isolation, but they seek and receive support from other workers” (Lipsky, 1980, pp. 75–76). The same holds true when studying the Dutch system of priority housing. While the applications for a certificate of housing urgency are primarily assessed by individual employees, they function within a so-called “micro-network” (Hupe & Hill, 2007, p. 285).

According to Siciliano, the actions of street-level workers should not be viewed as independent responses to their individual dilemmas; instead, attention should be paid to the “professional networks likely [shaping] the performance of frontline workers” (Siciliano, 2017, p. 81). Dutch street-level bureaucrats’ interpretation of priority housing regulations and guidelines is to a large extent “a function of the interactions between these units” (Keiser, 2010, p. 251). When deciding upon a priority housing application, Dutch decision-makers’ perceptions of information and thus their judgments may to a significant extent be influenced by the perception of information and (professional) viewpoints of their (non-hierarchical) colleagues and peers. Even though “the network perspective is only rarely adopted in street-level bureaucracy studies” (Loyens, 2019, p. 354) and “research on professional and intra-organizational networks has remained scarce” (Siciliano, 2017, p. 81), the findings of Keiser’s study on street-level bureaucrats’ decision-making suggest taking the influence of street-level bureaucrats’ micro-network into consideration when assessing the manner in which they arrive at their decisions. This especially holds true when considering Dutch decision-makers working within an urgency committee.

**Dutch street-level bureaucrats’ interpretation of priority housing eligibility criteria**

Earlier in this paper, it was noted that decision-makers by interpreting and applying the rules drafted by policymakers not only implement these rules but also help shape them. Analyzing how Dutch street-level bureaucrats interpret the criteria laid down in priority housing regulations therefore not only provides valuable insights into the decision-making process concerning the issuing of certificates of housing urgency but also allows for a better understanding of how this affects ex-offenders’ chances of successfully obtaining a priority status on a more systematic level.

A first eligibility criterion used in nearly all assessed regions as an admissibility requirement is that of “regional ties.” While the exact meaning of this term differs per priority housing arrangement, it usually requires an applicant to have lived in the particular region for a certain amount of time before being able to successfully apply for a certificate of housing
urgency. This period may range from two years preceding the application
to six continuous years in the last ten years before the request for a priority
status. With this criterion, policymakers aim to prevent their municipalities
from being “flooded” by households that are denied (priority) housing in
nearby regions.29

From the conducted interviews, it follows that Dutch decision-makers
interpret the “regional ties” criterion – just as other admissibility criteria,
such as income or age requirements – relatively strictly, generally making
applicants’ housing needs subordinate to the local policy aims. For ex-
offenders, however, the requirement to have lived in the region before
one’s application for a priority status may have significant consequences
for his or her chances of obtaining a certificate of housing urgency.
Especially those sentenced to longer prison sentences typically lack suffi-
cient regional ties. Consequently, most respondents indicated that the
“regional ties” criterion constitutes a serious blockade for ex-offenders try-
ing to obtain a priority status. Only two interviewees indicated they would
make an exception if the applicant’s situation would demand so, though
they emphasized that such departures from the admissibility criteria remain
very rare:

“We hardly ever deviate from this requirement (…) It might happen that you have
lived outside of the region because of a very specific treatment in a clinic that was not
available within the area. You cannot blame someone for that. In such cases we might
– once in a blue moon, if [the applicant] fails to meet the requirement by only two or
three months – nevertheless treat that person as if he or she were a resident.” –
Respondent 21

Whereas Dutch decision-makers appear careful not to make any (lasting)
exceptions to the admissibility requirements, they do seem to allow them-
selves more flexibility when applying further eligibility criteria. A clear
example of this is provided by the “own fault”-criterion, found in basically
every priority housing arrangement. The “own fault”-criterion states that
the emergency situation ((woon)noodsituatie) the applicant finds him- or
herself in should not have been “avoidable;” the applicant should not have
been responsible for the loss of his or her home due to his or her “own
actions” or “negligence.” That which is being categorized as someone’s
“own fault” appears to depend strongly on the personal views of the deci-
sion-maker. The majority of the interviewees, however, agreed that deten-
tion does not lead to the conclusion that the applicant’s consequent loss of
a home is her or her “own fault:”

“That’s something for the [Public Prosecution Service], not for us. The ex-prisoner has
completed his sentence, so that’s done (…) The urgency committee has not been
established to judge in judicial matters. And apart from that you may ask yourself
whether you can hold something against someone for all eternity. (…) Everyone
sometimes does something less smart in life, but (...) people deserve a second chance.”
– Respondent 23

Another respondent added that

“[i]t really has to do with someone’s residential behavior, so not with detention. It would also make little sense [to deny someone priority housing based on a detention history], because that has nothing to do with being able to live somewhere. It is not up to [the urgency committee] or the housing association to decide upon this.”
– Respondent 15

Respondent 1, however, did not agree with this generally voiced opinion and argued that the loss of a home as a result of being detained could be regarded as one’s “own fault:

“Yes, that is the consequence of a punishment following something you have done and of which you knew that it wasn’t allowed (...) Detention is in general regarded as your own fault.”
– Respondent 1

Others simply agreed that above all else, the “own fault”-criterion remains a difficult term to work with. Respondent 7, for example, described the term as “really dubious” and respondent 25 referred to its interpretation as “genuinely debatable.”

The above shows that whether an ex-offender qualifies for a certificate of housing urgency not only depends on the area in which he or she applies for such a certificate but also on what Lipsky describes as the street-level bureaucrat’s “personal standards of whether or not someone is deserving” (Lipsky, 1980, p. 23): “Differentiation among clients may take place because of workers’ preferences for some clients over others (...) [S]ome clients simply evoke workers’ sympathy or hostility” (Lipsky, 1980, pp. 108–109). However, street-level bureaucrats also “respond to general orientations toward clients’ worthiness or unworthiness that permeate the society.” According to Lipsky, street-level bureaucracies are political and their decision-making professionals are not sitting in an ivory tower either.

That street-level bureaucrats’ personal views may tip the scales in favor of the applicant can also be observed when considering the use of the hardship principle. This principle may for instance be invoked when the decision-maker deems the applicant blameworthy for his or her precarious housing situation but also believes the situation to be so pressing that it is necessary to nevertheless issue a certificate of housing priority. In such cases, street-level bureaucrats may decide to adopt a much more flexible and compassionate approach toward the rules.

Whereas all but one of the assessed regulations include a hardship clause, deviations from rules and policies based on extraordinary hardship are exceptional. One respondent referred to the use of the hardship clause as an “emergency measure”
“[y]ou need it maybe once or twice a year in very specific cases, when you are dealing with almost ethical dilemmas.” – Respondent 7

When discussing the use of the hardship principle, respondents are also very much aware of the fact that by referring to it they offer the applicant a different treatment than others with urgent housing needs. They appear careful not to make any lasting exceptions to the rules:

“It cannot be the case that Pete does not get any priority and John does on the same grounds. We all try to fall in line with each other.” – Respondent 25

Street-level bureaucrats who generally adopt a more flexible style of rule application explain – or even justify – the use of their discretionary powers to deviate from policy rules by insisting that despite their organization’s sometimes heavy caseloads, they view themselves as working on a case-by-case basis. When asked about her view on the possible feelings of inequality this approach may bring with it, one respondent strikingly stated:

“[I]t is always a tailored approach. One might also call it arbitrariness, but I like to think of it as a tailored approach.” – Respondent 3

The above reveals the dilemma individual decision-makers face when assessing or deciding upon priority housing applications. While Dutch street-level bureaucrats first and foremost view themselves as uniformly applying the rules, they also feel the need and opportunity to act more flexible and lenient toward applicants with particular urgent housing needs. The challenge is not to make any lasting exceptions to the rules or let compassion lead to arbitrariness. For those street-level bureaucrats with a style of rule application that can be placed toward either end of the spectrum (see Figure 2) this is perhaps easier than for those positioned more toward the center of the scale. The latter find themselves searching and maintaining a fragile balance between equity and responsiveness.

When considering the criteria laid down in most priority housing regulations, ex-offenders often face the risk of being ineligible for receiving priority status. They do not belong to the regulation’s target group, lack the required regional or social ties, or their homelessness is not considered an “emergency situation.”31 As a result, ex-offenders primarily seem to benefit from a more flexible style of rule application, allowing them to be exceptions to the rule. However, the discussion concerning the “own fault”-criterion shows that the final decision whether to grant an ex-offender a priority status often ultimately depends on the decision-maker’s personal (and moral) views.

Conclusions
In the introduction of this paper, the Dutch Custodial Institutions Agency was quoted as suggesting the use of certificates of housing urgency as a
possible means for persons leaving detention to quickly find stable housing. However, due to a lack of data, the Dutch system of priority housing was characterized as a virtually unexplored and unexplained black box. The multimethod study presented here aimed to determine whether priority housing has the potential of becoming (part of) the solution for ex-offenders’ dire housing problems, by using the Netherlands as an illustrative case study. To do so, ex-offenders’ chances of obtaining a priority status were first assessed on a systematic level by reviewing the existing priority housing arrangements in the sampled areas, using both doctrinal and quantitative research methods. Next, the study concentrated on individual decision-makers’ interpretation of relevant criteria and the use of their discretionary powers by presenting the results of the study’s qualitative empirical phase.

The research, first of all, showed that priority housing in the Netherlands is not organized on a national level, due to which it was necessary to collect and analyze the local legislation and policy documents of a sample of 45 municipalities. This systematic content analysis revealed that in almost all of the assessed areas it is possible for a person seeking a home to apply for a certificate of housing urgency. Table 1 shows that in 95% of the studied municipalities some form of priority housing system has been established, whether or not in cooperation with the local housing associations. The data presented in Table 2, however, indicate that not even one-fifth of the assessed regulations mention ex-offenders as being eligible for priority status. In one in ten areas individuals leaving detention even seem to be systematically excluded from using a certificate of housing urgency to solve their problematic housing situation.

To determine whether priority housing in the Netherlands can be considered an effective instrument for ex-offenders to find decent housing it was necessary to look beyond the rules and regulations and analyze how these are implemented and interpreted by the decision-makers. Using Lipsky’s theory on street-level bureaucrats, how frontline workers responsible for assessing and deciding upon the priority housing applications fulfill their jobs was assessed. It followed that although Dutch street-level bureaucrats receive some steering using policy regulations and guidelines, they enjoy much freedom when deciding upon individual applications. To determine how the decision-makers use their freedom when assessing ex-offenders’ priority housing applications, interviews were conducted with professionals involved with priority housing.

The interviews revealed that while decision-makers generally view themselves as uniformly and impartially applying the rules, they are aware of the margin of discretion they possess. If they believe that a more lenient and flexible approach is necessary for light of the applicant’s urgent
housing needs, they appear willing to make exceptions to the rules and provide a priority status even though the applicant does not meet all the requirements. The street-level bureaucrats nevertheless only allow for exceptions when they are convinced that a deviation from the rules does not lead to arbitrariness.

Because ex-offenders are often confronted with admissibility criteria that are particularly difficult for them to meet, such as the regional or social ties requirement – they generally benefit from being regarded by the decision-maker(s) as an exceptional case. Yet this also means that it strongly depends on the (individual) street-level bureaucrat’s willingness to interpret the rules in a for the ex-offender beneficial manner whether the ex-offender is granted a priority status. In addition to local policymakers being able to exclude persons leaving detention from their priority housing regulations – which has happened in a small number of municipalities – Dutch ex-offenders consequently have to rely on street-level bureaucrats’ personal views on their “worthiness or unworthiness” for a priority status.

The study shows that whereas in, for instance, the United States individuals released from prison and searching for decent accommodation experience significant hindrance from exclusionary policies, such blanket ban restrictions do not exist in the Netherlands, neither on a national level nor appreciably on a local level. When focusing on the instrument of priority housing, the Dutch certificate of housing urgency allows for more tailored solutions to ex-offenders’ individual housing problems. However, whereas the American approach toward the housing of ex-offenders is clear-cut and in principle similarly applies to all ex-offenders, the Netherlands’ fragmented approach – with its significant local differences and its strong dependence on decision-makers’ style of rule application – offers ex-offenders little legal certainty and carries in it the risk of unequal treatment. Which approach is to be preferred constitutes a normative question that cannot be answered here. Hopefully, this illustrative case study on priority housing in the Netherlands encourages policymakers, scholars, and others involved with the housing of our ex-offenders to do so.

Notes
1. Interview in: Boker (2019).
2. See on (the lack of) housing within the context of Maslow’s Theory (Sumerlin, 1995).
5. See 24 USC § 13663 (concerning dangerous sex offenders) and 24 CFR § 960.204 (concerning persons previously evicted due to drug-related criminal activity).
6. Dutch housing associations are obliged to rent 80% of their property to households with an income of up to €38,000, 10% to households with an income of up to €42,000 and 10% they may rent out to their own disposition (see Regeling toegelaten instellingen volkshuisvesting 2015, Appendix 4, under 9).
7. See on Dutch housing associations (Lijzenga & Boertien, 2016) and the Dutch Housing Act 2015.
8. See www.primos.datawonen.nl (last accessed on February 7, 2020).
9. The other option is to request access to a municipal shelter (Maatschappelijke Opvang); however, Dutch shelters only grant a temporary relief to one’s housing problem and may have long waiting lists as well (see Gielen et al., 2019).
10. The majority of street-level bureaucrats’ clients are non-voluntary and belong to low-income households or minority groups. According to Lipsky, “[t]his is because poor people, and minority group members, command fewer personal resources than more favored individuals, and this are more dependent upon governmental bureaucratic structures for fair treatment or provision of basic services” (Lipsky, 1969, p. 3).
12. Before one is able to comprehend how the law works in practice (“law in action”) one has to know how the law reads (Colombi Ciacchi, 2013; Pound, 1910).
14. This “grounded” approach is used “by an inductive researcher who may not want to pre-code any datum until s/he has collected it, seen how it functions or nests in its context, and determined how many varieties of it there are” (Basit, 2003, p. 145).
15. Fragments from the interviews used in this paper have been translated by the author from Dutch to English with as much accuracy as possible.
18. Private homeowners cannot be obliged to rent their property to persons with priority needs – they enjoy full contractual freedom, meaning they are free to rent their home to their preferred rental candidate.
21. Social urgency is often provided to divorced parents with young children who are likely to become homeless if they do not receive a priority status. However, social urgency may also be provided to persons who lost their previous home due to a prison sentence, depending on decision-makers’ interpretation of certain eligibility criteria.
22. This public-private cooperation may be explained by referring to the Dutch Housing Act 2015 which stimulates municipalities to work together with housing associations and tenants’ organizations in realizing local social housing objectives, for instance by means of the local performance agreements.
23. The public priority housing system is primarily reserved for persons receiving support or care on the basis of the Dutch Social Support Act 2015 (Wet maatschappelijke ondersteuning) whereas the private arrangement has been created for households whose home – owned by the housing association – will be demolished and for individuals eligible for medical urgency. According to the municipal’s (public) priority housing scheme, individuals who “have a prison sentence, be on remand, in
preventive detention, in detention under a hospital order (tbs) or have debts” do not qualify for a certificate of housing urgency.

24. These numbers include the decision-makers involved with a special priority housing arrangement as well.

25. In the remaining seven municipalities, it is unknown who the decision-makers are, 42–51.

26. This is also reflected by the lack of ex-post control of decision makers in individual cases. Although urgency committees are usually obliged to present annual reports in which they account for their general activities and financial status, none of the interviewed professionals seem to have to give account for decisions in individual cases.

27. De Winter (2019) further elaborated on these dimensions when researching the enforcement styles of Dutch social security agencies’ officials.

28. In a number of areas “social ties” are required, referring to possessions, employment, social or family relationships in the area or any other social connections.

29. Respondent 3 was surprised by the widespread use of this criterion, referring to it as a particularly “superseded” requirement.

30. As suggested by respondent 23.

31. All of the examined regulations require some form of “emergency situation” ((woon)noodsituatie) before a priority status can be granted. It follows from the conducted interviews that being homeless or being threatened with homelessness is in itself not enough to qualify for a certificate of housing urgency, unless minors are involved.

32. Excluding ex-offenders on the basis of their criminal history occurs in other contexts in the Netherlands as well. With regard to housing, ex-offenders are since 2016 faced with an extension of the Dutch Urban Areas Special Measures Act. This Act allows local authorities to demand from prospective tenants that they obtain a special housing permit before they are allowed to establish themselves in certain designated areas. People with a history of criminal or anti-social behavior are among those who are excluded from obtaining such a permit (see, e.g., Van Tongeren, 2020). Another example not directly related to housing is provided in a study by Paulina and Schuilenburg (2013). They found that whereas almost half of the examined insurance companies in the Netherlands do not automatically accept ex-offenders, about one in four companies categorically refuse to insure ex-offenders on the basis of their criminal history.

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References


## Appendix A: List of sample municipalities

<table>
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</tr>
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<td>1. Alkmaar</td>
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<td><strong>14,668</strong></td>
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1These figures show the number of returning ex-offenders registered as in need of aftercare in 2017.
## Appendix B: List of interview respondents

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<th>Respondent number</th>
<th>Organization</th>
<th>Function</th>
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<td>1</td>
<td>Municipality</td>
<td>Housing officer (medewerker Wonen)</td>
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<td>Housing support organization</td>
<td>Location coordinator</td>
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<td>3</td>
<td>Housing association</td>
<td>Consultant Society and Care (consulent Maatschappij en Zorg)</td>
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<td>4</td>
<td>Housing association</td>
<td>Housing officer/professional (medewerker Verhuur)</td>
</tr>
<tr>
<td>5</td>
<td>Regional federation of housing associations</td>
<td>Policy advisor</td>
</tr>
<tr>
<td>6</td>
<td>Municipality</td>
<td>Policy advisor</td>
</tr>
<tr>
<td>7</td>
<td>Municipality</td>
<td>Former member of local urgency committee</td>
</tr>
<tr>
<td>8</td>
<td>Housing support organization</td>
<td>Client manager</td>
</tr>
<tr>
<td>9</td>
<td>Municipality</td>
<td>Housing allocation policy officer</td>
</tr>
<tr>
<td>10</td>
<td>Housing association</td>
<td>Housing officer (medewerker Bewonerszaken) / contact ‘special target groups’, incl. ex-offenders</td>
</tr>
<tr>
<td>11</td>
<td>Urgency committee</td>
<td>Advisor priority housing</td>
</tr>
<tr>
<td>12</td>
<td>Housing support organization</td>
<td>Case manager</td>
</tr>
<tr>
<td>13</td>
<td>Housing association</td>
<td>Housing officer (medewerker Wonen)</td>
</tr>
<tr>
<td>14</td>
<td>Housing association</td>
<td>Housing officer (medewerker Wonen), responsible for preparing priority housing applications</td>
</tr>
<tr>
<td>15</td>
<td>Urgency committee</td>
<td>Secretary</td>
</tr>
<tr>
<td>16</td>
<td>Regional priority housing organization</td>
<td>Officer priority housing management (medewerker Contingentbeheer)</td>
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<tr>
<td>17</td>
<td>Housing association</td>
<td>Policy advisor Housing</td>
</tr>
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<td>18</td>
<td>Regional housing allocation organization</td>
<td>Manager</td>
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<tr>
<td>19</td>
<td>Housing association</td>
<td>Policy advisor Social Management (Adviseur Sociaal Beheer)</td>
</tr>
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<td>20</td>
<td>Urgency committee</td>
<td>Case manager</td>
</tr>
<tr>
<td>21</td>
<td>Urgency committee</td>
<td>Case manager</td>
</tr>
<tr>
<td>22</td>
<td>Housing association</td>
<td>Senior manager social domain / area coordinator</td>
</tr>
<tr>
<td>23</td>
<td>Urgency committee</td>
<td>Secretary</td>
</tr>
<tr>
<td>24</td>
<td>Housing association</td>
<td>Policy advisor Social Management</td>
</tr>
<tr>
<td>25</td>
<td>Urgency committee housing association</td>
<td>Team leader rental/sales operations and customer service</td>
</tr>
<tr>
<td>26</td>
<td>Municipality</td>
<td>Policy advisor</td>
</tr>
<tr>
<td>27</td>
<td>Urgency committee</td>
<td>Secretary</td>
</tr>
<tr>
<td>28</td>
<td>Municipality</td>
<td>Advisor Safety Special Target Groups/Aftercare coordinator</td>
</tr>
</tbody>
</table>

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### Appendix C: List of focus group meeting participants

<table>
<thead>
<tr>
<th>Organization</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Housing association</td>
<td>Housing officer (medewerker Bewonerszaken) / contact “special target groups,” incl. ex-offenders</td>
</tr>
<tr>
<td>2. Regional priority housing organization</td>
<td>Officer priority housing management (medewerker Contingentbeheer)</td>
</tr>
<tr>
<td>3. Urgency committee</td>
<td>Case manager</td>
</tr>
<tr>
<td>4. Municipality</td>
<td>Policy advisor</td>
</tr>
<tr>
<td>5. Association of Netherlands Municipalities</td>
<td>Policy officer care and safety/VLOT</td>
</tr>
<tr>
<td>6. Association of Netherlands Municipalities</td>
<td>Region advisor VLOT</td>
</tr>
<tr>
<td>7. University of Groningen</td>
<td>Professor of Public Administration</td>
</tr>
<tr>
<td>8. University of Groningen</td>
<td>Professor of Public Order Law</td>
</tr>
</tbody>
</table>

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1. **VLOT (Verbindend Landelijk Ondersteunings Team)** is an inter-administrative cooperation with a core team consisting of representatives from the Dutch Ministries of Health, Interior Affairs, and Justice & Safety and the Association of Netherlands Municipalities. It has been established to support Dutch municipalities and regions with their personal-oriented approach toward vulnerable individuals and to ensure better cooperation between municipalities and other parties involved. See: [https://vng.nl/artikelen/verbindend-landelijk-ondersteuningssteam-vlot](https://vng.nl/artikelen/verbindend-landelijk-ondersteuningssteam-vlot) (last accessed May 6, 2020).