Heerlen - follow-up email and acknowledgement

Public, anonymised English translation. Michel Peen is the only personal name retained.

Follow-up email sent: 19 October 2026, 10:06:46 Europe/Amsterdam.

Automatic acknowledgement received: 19 October 2026, 10:07:39 Europe/Amsterdam.

The acknowledgement contains no substantive response or specific response date.

SENT FOLLOW-UP EMAIL

Dear Mayor,
Dear Municipal Executive,
Dear Pulse-Twin Team,

On 29 July 2026 I submitted my research report and seven questions concerning the municipality's governance to you. As announced in my response of 16 October, I am assessing today which governance issues remain unresolved. I have expressly taken your letter of 16 October 2026, reference 960865, into account. It contains substantive information, but does not yet answer my original seven questions in full.

I acknowledge your information about the start-up and design phase, the absence of working algorithms and prompt sets, the use of aggregated and anonymised data, ELSA advice, human assessment and privacy assessments. Your letter was sent on behalf of the municipal executive and therefore counts as a response from the municipal administration. Whether the mayor has personally signed it is not the criterion for completeness.

For an accurate chronology: on 28 August, the Pulse-Twin Team wrote that it aimed to provide a substantive, separate response by the end of September. The team also wrote that it would inform me promptly and give reasons if that proved unachievable. This was not an unconditional firm promise of a response by that date. My reminder of 1 October and follow-up email of 9 October also form part of the history. The contact-routing email of 5 October did not answer the seven questions.

On 16 October I already sent the original questions and the outstanding points to the Woo desk, copying you. At present I have received no additional substantive response on these governance issues or a specific, reasoned and reasonably near response date. The questions in your letter of 16 October differ from my original questions. I therefore ask you to address the following outstanding points using the original numbering:

1. Does the municipal executive recognise the factual developments, questions and risks described in the report?
Your letter describes the project's principles. I still seek your assessment of the relevant developments, questions and risks in my report, indicating what you recognise, dispute or are still investigating.

2. Which applications of AI, algorithms, risk models or automated pattern recognition are operational, tested or envisaged within PULSE-TWIN?
I take into account your statement that there are no working algorithms or prompt sets. A concrete overview that also covers tested and envisaged applications, differentiated by status, is still missing.

3. Can the outputs of these systems lead directly or indirectly to additional surveillance, enforcement or interventions in particular neighbourhoods or in relation to particular groups?
Your letter mentions human judgement. It remains unclear whether and how the insights can directly or indirectly influence the allocation of surveillance, enforcement or interventions, and how

that influence is assessed.

4. What safeguards prevent historical records or more intensive surveillance from reinforcing themselves and consequently leading to more records and interventions?
You refer to aggregated data and ELSA advice on bias. I still seek the concrete safeguards against this specific feedback loop between records, deployment and new records, together with their current status.

5. Which DPIAs, fundamental-rights assessments, independent audits and opinions of the Data Protection Officer have been completed, and how is their follow-up secured at governance level?
I still seek identification of the assessments and opinions actually completed, including their titles, dates, status and governance arrangements for follow-up. For each item, also state if it does not yet exist, is planned or is considered unnecessary, and why. I am not thereby assuming that every assessment was already required to be completed at this project stage.

6. How are residents informed in understandable terms about data collection, data linkage, automated analysis and their opportunities for access, correction, objection and complaint?
I take into account your reference to the project website and future resident involvement. I still seek the concrete information provided on these topics and the opportunities that actually apply in the current project design.

7. How and when will the municipal council be fully informed about the operation, risks, costs, results and any expansion of PULSE-TWIN?
Your seventh answer concerns residents and civil-society organisations. The original question about information to the municipal council therefore remains unanswered. Please state what information the council will receive, when, and who is responsible.

I also seek written confirmation of whether the mayor has taken note of my report and questions, whether the answers were also given on his behalf, whether the contact instruction of 5 October was given on his behalf, and who holds political responsibility for answering them.

I attach the decision of 9 October 2026 on complaint 1017347. The complaint was upheld because no feedback had been provided before the complaint was submitted. I rely on the decision for that established communication failure. The substantive information now received is taken into account; the outstanding answers described above still require a remedy.

For this purpose I allow a full period of five working days after this email is sent: until Monday 26 October 2026 at 23:59 Europe/Amsterdam. This is the remedial deadline I request for the substantive governance response. If you consider a complete response within that period objectively impossible, I ask you to propose a specific, reasoned and reasonably near response date within the same period. A proposal does not automatically move the remedial deadline; I will assess whether it can establish an appropriate agreement on a response date.

An acknowledgement of receipt, general procedural update or referral to the Woo desk does not replace the outstanding substantive answers. My further Woo clarification of 16 October and the statutory time limits in Woo case 960865 are separate from this remedial deadline for the governance questions.

If, after the remedial period has expired, the original questions have not been sufficiently answered and no appropriate specific response-date agreement has been reached, I will submit the complete dossier with numbered exhibits to the National Ombudsman and to Heerlen’s municipal council through the council clerk on Tuesday 27 October 2026 at around 12:00. Your letter of 16 October and any further response will also be included. I will then request an investigation into the complaint handling and the remedy for the outstanding governance response, and involvement of the council in political accountability.

I wish to receive all communications exclusively in writing by email.

Attachment: decision on complaint 1017347 of 9 October 2026.

Kind regards,

Michel Peen

RECEIVED AUTOMATIC ACKNOWLEDGEMENT

Dear reader,

Thank you for your email to the municipality of Heerlen. We will process your enquiry or application as soon as possible.

Our website, www.heerlen.nl, provides extensive information about the municipality of Heerlen, including opening hours, products and services, official notices, roadworks, events, Sunday shopping and projects.

You can also arrange matters with the municipality online. For example, you can make an appointment at the public service desk, request an extract from the Personal Records Database or a civil-status certificate, report a change of address and much more!

Nuisance or something broken in Heerlen? Report it directly to the department at https://melding.heerlen.nl/. Urgent reports can be made 24 hours a day, seven days a week via the municipal reporting number [telephone number removed].

The customer contact centre can be reached by telephone via the municipal telephone number [telephone numbers removed] on working days from 08:30 to 17:00.

Greetings from Heerlen,

Customer Contact Centre

Heerlen

Municipality of Heerlen, Public Services. [Postal address, visiting address and telephone number removed.]