

PUBLIC DOCUMENT | ENGLISH TRANSLATION

Formal Woo request

PULSE-TWIN, AI, Social Digital Twin and digital surveillance

**IMPORTANT
TRANSLATION NOTE**

This document is an English translation of the public, redacted Dutch request submitted on 26 July 2026 under the Dutch Open Government Act (Wet open overheid, Woo). It is provided solely for public information and international readers. The Dutch original is the authoritative record and governs any legal interpretation. This translation was not submitted as a new, supplementary or amended Woo request.

ORIGINAL DATE	26 July 2026, 00:50
REQUESTER	Michel Peen
ADDRESSEE	Municipal Executive of Heerlen
ORIGINAL LANGUAGE	Dutch
PUBLIC REDACTIONS	Home address and personal email addresses
TRANSLATION PUBLISHED	7 August 2026

Independent public-interest dossier by Michel Peen

TRANSLATED BODY OF THE ORIGINAL REQUEST

Formal Woo request - PULSE-TWIN, AI, Social Digital Twin and digital surveillance

From	Michel Vdf - Broodfan - [personal email address redacted]
To	gemeente@heerlen.nl
Cc	woo-contactpersoon@heerlen.nl
Bcc	[personal email address redacted]
Sent	26 July 2026 at 00:50

Dear Municipal Executive,

I hereby submit a request for disclosure under the Dutch Open Government Act (Wet open overheid, Woo).

1. Subject and scope

The request concerns the preparation, decision-making, development, testing, procurement, data processing, governance, evaluation and intended commissioning or scaling up of:

- PULSE-TWIN;
- the Social Digital Twin;
- the AI copilot and mobile or wearable tools for professionals;
- the Public Smart Safety/Liveability Center and the associated data engine, dashboards and visualisations;
- the residents' app or Heerlen app module for reports, warnings and participation;
- algorithms, AI, predictive analyses, risk or hotspot analyses and automated pattern recognition relating to liveability, safety, crime, public order or the deployment of professionals;
- actual or proposed links with camera surveillance, municipal reports, police data, information from municipal enforcement officers (BOAs), neighbourhood police officers, youth workers, care or neighbourhood teams and other municipal or external data sources.

The request covers documents from 1 January 2023 up to and including the date of the decision on this request. To the extent that preparatory documents from before 1 January 2023 are still being used, have been added to the project file or form the basis of later decision-making, those documents also fall within the scope of the request.

2. Documents requested

I request disclosure of the existing documents described below, irrespective of file format, storage location or internal designation.

A. Governance, scope and decision-making

- project proposals, business cases, grant applications, grant agreements, budgets, work packages, project plans, roadmaps, milestone schedules and progress reports;
- decisions of the Municipal Executive, directors, steering committee and management concerning the start, scope, financing, modification, pilot, commissioning, scaling up, temporary suspension or termination;

- agendas, decision lists, minutes, action lists and presentations of the steering committee, project group and meetings concerning data governance, privacy, ethics, security and architecture;
- documents defining the boundaries of PULSE-TWIN in relation to other municipal AI, data analysis, monitoring, profiling or predictive systems.

B. System architecture and data flows

- current and previous architecture diagrams, system designs, solution designs, data-flow diagrams, data models, API overviews, interfaces and technical specifications;
- overviews of all source, training, test, validation, reference and production datasets, stating for each dataset its owner, provenance, fields or variables, geographic granularity, update frequency, purpose, legal basis, retention period, recipients and status;
- documents concerning anonymisation, pseudonymisation, aggregation, re-identification risk, synthetic data, data minimisation and separation between data governed by the GDPR and data governed by the Dutch Police Data Act (Wet politiegegevens, Wpg);
- access and role matrices, authorisation policy, logging, log reviews, export options, retention periods, destruction procedures, backups and incident response;
- documents concerning cloud, edge, mobile and wearable components, hosting locations, suppliers and data transfers outside the European Economic Area.

C. Algorithms, models and performance

- model cards, datasheets for datasets, algorithm descriptions, decision rules, prompt or instruction sets, classification schemes and version documentation;
- descriptions of intended outputs such as trend, hotspot, risk, scenario or intervention forecasts;
- test, validation, acceptance and audit reports, including error margins, false positives, false negatives, accuracy, robustness, uncertainty margins and performance by district or relevant group;
- documents concerning bias, discrimination risk, proxy variables, geographic profiling, feedback loops and correction for differences in reporting or enforcement intensity;
- documents concerning human oversight, authority to depart from system advice, escalation, explainability, statement of reasons and the recording of decisions to follow or disregard system advice;
- documents concerning inclusion in the national Algorithm Register and classification under the European AI Act, including any assessment as a prohibited, high-risk or otherwise regulated system.

D. Privacy, fundamental rights, ethics and security

- DPIAs, draft DPIAs, pre-DPIAs, privacy quick scans, fundamental-rights impact assessments, human-rights reviews and proportionality and subsidiarity assessments;
- advice, comments, conditions and warnings from the Data Protection Officer, privacy officers, CISO, security officers, legal department and external experts, together with documents concerning the follow-up to that input;
- ELSA analyses and other ethical assessments;
- the establishment decision, rules, mandate, membership, declarations of interests, agendas, minutes and advice of the announced independent ethics committee;
- threat models, risk analyses, security architecture, penetration tests, audit reports and remediation plans, to the extent that their disclosure can responsibly take place;
- data-breach, security and incident records relating to the systems referred to, omitting information whose disclosure would cause concrete harm to current security.

E. Camera surveillance, public order and data linkage

- documents in which it was examined, discussed, proposed, tested, permitted or ruled out that camera images, camera metadata, ANPR, sensor data, control-room information or public-order data would be used within PULSE-TWIN or related analyses;
- documents concerning the relationship between Section 151c of the Dutch Municipalities Act, the Dutch Police Data Act and municipal processing under the GDPR;
- arrangements, protocols, covenants and data-sharing agreements with the police, municipal enforcement organisation, safety partners and care, youth, welfare and neighbourhood organisations;
- documents concerning the overlap between PULSE-TWIN focus districts and areas with fixed or mobile camera surveillance;
- documents concerning function creep: the reuse, for other purposes, of data collected for liveability, management, care, participation or safety.

F. Residents, professionals and impact

- communication and participation plans, letters to residents, invitations, presentations, questionnaires, reports, raw or summarised results and documents concerning the processing of residents' input;
- user research, pilot scripts, training material, manuals and work instructions for municipal enforcement officers (BOAs), neighbourhood police officers, youth workers, area managers, analysts and other users;
- documents determining which interventions or decisions may be influenced by model outputs;
- documents concerning information, access, correction, objections, complaint handling and other legal protection for residents who experience direct or area-based effects;
- complaints, signals and evaluations concerning stigmatisation, chilling effects, unequal treatment or erosion of trust, anonymised where necessary.

G. External parties, procurement and intellectual property

- procurement documents, market consultations, quotations, award decisions, assignments, contracts, addenda, data-processing agreements, service-level agreements and exit plans;
- agreements concerning ownership of data, models, source code, documentation and derived insights;
- agreements concerning subprocessors, audit rights, supplier logs, model updates, reuse for training, confidentiality, deletion and portability;
- documents concerning Solido and every other supplier, knowledge institution or consortium or project partner providing technology, data, advice or implementation;
- documents concerning cooperation with the National Police, Buurteams Heerlen, JENS, Stichting Veilig Ontwerp en Beheer, Brightlands Smart Services Campus, Maastricht University/Brightlands Institute for Smart Society and the transfer cities involved, insofar as the municipality possesses these documents or can exercise control over them.

H. Evaluation, effectiveness and oversight

- baseline measurements, indicator frameworks, KPIs, evaluation plans, interim evaluations, control-group or comparison methods and impact reports;
- documents concerning costs, benefits, adverse effects and the distribution of burdens and benefits across districts and groups;
- documents establishing stop, pause, modification or scaling-up criteria;
- internal or external audits and documents concerning periodic review of lawfulness, effectiveness, data quality, model performance, access logs and compliance with conditions;

- reports to the Municipal Council, Municipal Executive, grant provider and European Urban Initiative that are not yet fully public.

1. Earlier narrowing and search process

Insofar as the municipality stated in an earlier Woo file that a broader request had, following consultation, been limited exclusively to PULSE-TWIN, I also request:

- all documents recording the proposed restriction, consent to it and the final scope;
- meeting notes, telephone notes, emails and internal records on which that assertion was based;
- the search instruction, search terms, systems, mailboxes, collaboration environments and officials consulted in the earlier search;
- inventory and results lists from that search;
- documents showing whether searches were conducted, within or outside PULSE-TWIN, for other AI, monitoring, profiling, risk-analysis and predictive applications.

3. Search process and definition of documents

For the purposes of this request, documents also include emails with attachments, internal memoranda, chat and collaboration messages used for business purposes, Teams or comparable channel messages, presentations, spreadsheets, databases or exports, tickets, version documentation, logs, audio or video recordings of business meetings and documents held by external project partners over which the municipality can in fact exercise control.

I request that the municipality not limit its search to documents containing only the term 'PULSE-TWIN'. Please also use project names, abbreviations, names of building blocks, suppliers and partners, and search terms such as Social Digital Twin, AI copilot, Public Smart Safety Center, liveability, safety engine, predictive, hotspot, profiling, risk, dashboard, wearable, data engine, ELSA, DPIA, camera, Wpg, report, intervention and comparable Dutch terms.

I request a verifiable description of the search, including the organisational units, officials, systems, storage locations, time period and search terms used.

4. Documents already in the public domain

The request primarily concerns documents that are not yet fully public. If the municipality considers a document already public, I do not request a new copy provided that, for each document, the municipality supplies the exact title, date, version and a direct working location. A general reference to a website, project page, public register or extensive file is insufficient.

Drafts, attachments, underlying correspondence and differing or earlier versions remain within the scope of the request where they contain additional information.

5. Method of disclosure and inventory list

I request digital disclosure by email or download link. I would also prefer to receive structured data, tables and overviews in their original, machine-readable format, such as XLSX, CSV or JSON, in addition to any PDF version.

I request an inventory list stating, for each document found:

- sequential number;
- title or brief description;
- date;
- author or sender and recipient;

- document type;
- disclosed, partially disclosed or refused;
- the statutory ground for refusal applied to each part not disclosed.

For each document and each passage, I request a separate and specific balancing of interests. Where only part cannot be disclosed, I request disclosure of the remainder.

6. Scope, clarification and partial decisions

This request is extensive but is specifically delimited by project, period, systems and document categories. If the municipality nevertheless considers clarification necessary, I request that, in accordance with Section 4.2a Woo, it actively consult with me and specify which part requires clarification. A request for consultation does not constitute consent to limit the scope. Any amendment or restriction is valid only after I have expressly agreed to it in writing.

If phased handling would assist progress, I agree to partial decisions for each main section, provided that the full scope is retained and the statutory time limits are observed. Priority may be given to sections B, C, D, E and I.

7. Registration and communication

I request that you register this message as a formal Woo request, confirm the date of receipt and case number in writing, and conduct all future communication exclusively in writing by email.

The attached research report is provided solely as substantive context and an aid to the search. It does not limit or replace the scope described above.

Kind regards,

Michel Peen

[home address redacted]

[personal email address redacted]

I communicate exclusively in writing and by email.

**ATTACHMENT TO THE
ORIGINAL REQUEST**

Onderzoeksrapport_AI_toezicht_publieke_ruimte_Heerlen_2026.pdf (92 KB)