

Street-Level Bureaucrats' Policy Enactment

A Case Study on the Influences of Institutional and Actor-Centred Factors on
Civic Integration Consultants' Policy Enactment

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PREFACE

Dear reader,

Every language and culture has its own distinct features and characteristics. Through language you can express yourself. It structures your thinking, and provides you with the opportunity to say things in a particular kind of way, and thereby also express certain sentiments. This makes it almost impossible to accurately translate some words or phrases into another language as some of these aspects are bound to get lost in translation. This discovery has made me fall in love with languages at an early age. For instance, my favourite German word is “fernweh”. Literally translated it means something like the pain of being far away which refers to the passion of exploring the ‘unknown’, i.e. going away and leaving your home behind.

Such sentiments are, however, only known to people who have a home. Some people are, however, still trying to set up house in a foreign country. It can be challenging to build up a new life in a foreign country. To some degree, I can relate to these struggles as I have lived several years abroad, and also struggled to integrate within these countries. Accordingly, I have always been fascinated by refugees, immigrants, and expats, and, therefore, decided to delve into the dynamics of the Civic Integration Act 2021. I have tried to analyse how the act is enacted by civic integration consultants, and aimed to assess which factors influence their policy enactment.

Within the overall research process, there were many obstacles to overcome, but eventually I made it through. If it had not been for my mum, sister, friends, and the mental support of my supervisor dr. I. Radtke, I would not have been able to submit my thesis. They all lent me their support in their own kind of ways, changed or challenged my perspective, and thereby gave me the right stimulus to push further. Furthermore, I would like to express my gratitude to all respondents for their contribution to this thesis. I really enjoyed these conversations, and admire their efforts to give succour to newcomers.

Writing a thesis is, however, not only about conducting research, but also about mental growth. The thesis is a symbolic assignment to conclude your life as a student, and, for some time, I have dreaded taking the next step since I felt unprepared to make my mark in the world. Nonetheless, I am eager to move on. Perhaps I will become an immigrant myself. We will see where life takes us.

Yours faithfully,

Jacqueline van der Vegte

Abstract

Lipsky's theory of street-level bureaucracy is a widely employed theory to assess the influence of street-level bureaucrat's policy delivery. Street-level bureaucrats enact policy through interactions with citizens, hereby they tend to develop their own response repertoire apropos limitations to their work setting like time shortage, high caseloads, etc. This can induce differences in street-level bureaucrats' policy delivery. To address these differences, this thesis has analysed how institutional and actor-centred factors influence street-level bureaucrats' policy enactment in terms of their policy interpretations and translations, i.e. doing policy. A typical case study has been conducted concentrating on the policy enactment of civic integration consultants tasked with the enforcement of the Dutch Civic Integration Act 2021. They coordinate newcomers' integration, and, thereby, exercise considerable influence over newcomers' civic integration. This suggests that these civic integration consultants are a primary example of street-level bureaucrats. This thesis helps to increase our knowledge of street-level bureaucrats to better understand the efficacy of policy-making. With the help of nine documents, three participant observations, and fourteen semi-structured interviews, qualitative content analysis has been conducted. Findings demonstrate that institutional and actor-centred factors influence civic integration consultants' policy enactment differently. Some factors affect civic integration consultants' policy interpretations or fuel a clash between different policy interpretations, whereas other factors predominantly affect civic integration consultants' policy translations. These insights shed further light on how institutional and actor-centred factors influence street-level bureaucrats' policy enactment, and highlight that the interplay between street-level bureaucrats' policy interpretations and translations require further consideration. Policy interpretations and translations are the missing link accounting for some differences in street-level bureaucrats' policy enactment.

Keywords: Street-level bureaucracy, street-level bureaucrats, civic integration, policy enactment, policy interpretation, policy translation, Civic Integration Act 2021

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1. Introduction

Within academic research doubt has been cast on the efficacy of civic integration policies. Only a handful of studies indicate that civic integration policies have a positive effect on newcomers' civic integration (Koopmans, 2010; Hoehne & Michalkowski, 2016), whereas other studies have not found supporting evidence suggesting that civic integration policies spur integration (Ersanilli & Koopmans, 2011; Goodman & Wright, 2015; Bakkær Simonsen, 2017). Notwithstanding these findings, many European countries resort to civic integration policies to facilitate the integration of newcomers.

Also the Netherlands, a country with a long-standing tradition of civic integration policies, has recently adopted another civic integration policy: The Civic Integration Act 2021 (*Wet Inburgering 2021*). This act came into force on January 1st, 2022 and has radically changed the provision of civic integration in the Netherlands. Beforehand the Civic Integration Act 2013 dictated that newcomers had to sort out their own civic integration. This meant that newcomers had to find their own language schools whilst state assistance was provided through soft loans (Fokkink, 2022; Goodman, 2014; Rijksoverheid, n.d.b; Scholten et al., 2019). In contrast, civic integration is nowadays coordinated by municipalities which rely upon civic integration consultants to enforce the act. Civic integration consultants give succour to newcomers by drafting a personal integration and participation plan (PIP) in which they reach important decisions about newcomers' civic integration trajectory in terms of the requirements they must meet to successfully integrate. Non-compliance can, thereby, have severe consequences in terms of residence provocal or fines (Buro voor jou, 2021; Divosa, n.d.a; Stimulansz, n.d.a, n.d.b; Overheid, 2022). This signifies that Dutch civic integration consultants are a primary example of street-level bureaucrats, i.e. frontline governmental workers who enact policy through their interactions with clients (Lipsky, 2010).

Theory highlights that street-level bureaucrats face dilemmas. Not only do they often cope with extensive caseloads, staff shortages, and contradictory and/or ambiguous expectations, but they also might lack experience or training, have limited access to information, and little time for decision-making which encourages them to develop certain routines and preferences to remain in control of their jobs. Accordingly, the interplay between such limitations and practices are often mentioned as factors influencing street-level bureaucrats' policy delivery given that street-level bureaucrats also hold an interesting position in relation to their tasks and services (Lipsky, 2010). On the one hand they need to secure equal treatment of clients, while, on the other hand, they also need to pay attention to the personal circumstances in terms of doing something for clients if necessary (Lipsky, 2010). The combination of these forces suggests that policies are bound to be *enacted* differently. Street-level bureaucrats may interpret policies differently, and, ultimately, also translate policies, i.e. do policies, differently (Ball et al., 2012; Lipsky, 2010). Therefore, it is important to increase our knowledge of street-level bureaucracy to better understand the efficacy of policy making.

For these purposes, this thesis employs a typical case study concentrating on Dutch civic integration consultants tasked with the enforcement of the Civic Integration Act 2021. This is a suitable case to scrutinise this theoretical puzzle as academics often reflect upon policies as attempts to resolve certain problems through law-making or prescriptions while neglecting the different momentums within policy making processes. Policy-making and implementation, however, *occur at all levels and sites*, involving negotiations, contestations, and struggles between actors since policies rarely dictate specific courses of action (Ball et al., 2012). This is also the case for the Dutch civic integration policy. Several parties and policy actors are involved within its implementation process, although civic integration consultants are predominantly tasked with the enforcement of the act (Government of the Netherlands, n.d.; Overheid, 2022; Stimulansz, n.d.a). They need to reach important decisions about newcomers' civic integration, yet treat them equally and pay attention to their personal circumstances (Lipsky, 2010). This makes it highly relevant to explain their role within policy-making processes as their decisions and actions partially account for the efficacy of this civic integration policy.

Accordingly, to address this conundrum, this thesis resorts to the following research question:

“How do institutional and actor-centred factors influence street-level bureaucrats’ policy enactment, i.e. policy interpretation and translation?”

To answer the research question, this thesis relies upon several theories. First, Lipsky (2010) identifies several factors that can influence street-level bureaucrats’ policy delivery. These different factors are classified with the help of Scharpf’s (1997) theory of actor-centred institutionalism which foregrounds the interplay between policy actors and the institutional environment in which they are embedded. Equal consideration is given to the institutional environment and personhood by classifying factors as either institutional or actor-centred. And, to analyse the effects of institutional and actor-centred factors on street-level bureaucrats’ policy delivery, this thesis introduces Stephan Ball’s theory of enactment as a missing link to assess these influences. This theory conceptualises policy enactment through a two-fold focus by considering policy actors’ *policy interpretations*, i.e. policy conceptions, and *translations*, i.e. the way they do policy (Ball et al, 2012).

This two-fold analysis helps to grasp the inner dynamics of street-level bureaucrats’ role within policy making processes. It enables this thesis to study the influence of institutional and actor-centred factors on street-level bureaucrats in-depth as it is presumed that institutional and actor-centred factors can influence street-level bureaucrats’ policy enactment in different manners. These factors may affect their overall policy enactment. Or, they may influence both aspects differently, and, thereby, also induce some form of disconnection between street-level-bureaucrats policy interpretations and translations (Ball et al., 2012). Ergo, deeper insights are gained about the influence of institutional and actor-centred on street-level bureaucrats’ policy enactment.

1.1 Relevance

There is a lot to gain from conducting this research. This thesis makes a significant contribution to several academic fields in the form of theory building and testing, and is relevant to general street-level bureaucrat practitioners and the civic integration sector. It informs them about the way in which street-level bureaucrats interpret and translate policies apropos institutional and actor-centred factors. It raises awareness about the influence of the institutional factors on street-level bureaucrats' policy enactment and draws attention to the fact that actor-centred factors influence street-level bureaucrats' policy enactment, suggesting that such factors ought to be given greater consideration in relation to hiring practices.

Academic relevance

This thesis also makes a significant contribution to two academic debates. First, this thesis is relevant to *the local turn*. The local turn can be described as academic interest in the role of local governments in the policy-making process of nationally drafted civic integration policies. It stresses that cities and regions can become active policy agents in the enforcement of civic integration policies (Emilsson, 2015; Gebhardt, 2016; Jørgensen, 2012; Oomen & Leenders, 2020; Scholten, 2016; Hepburn & Zapata-Barrero, 2014; Zapata-Barrero et al., 2017). It remains, however, unclear what kind of role local governments exactly fulfil (Dekker et al., 2015). This thesis contributes to this stream of literature by drawing attention to the role of street-level bureaucrats in the provision of civic integration policies. By doing so, greater consideration is given to the role of civic integration consultants, and, thereby, sheds light on the role of local governments in the policy-making process.

And, second, this thesis contributes to the literature stream which focuses on the role of street-level bureaucrats in the provision of civic integration policies. The thesis analyses civic integration consultants' understanding of the Civic Integration Act, and considers how these interpretations inform their actions, i.e. policy translations. By doing so, this analysis partially fills the gap regarding street-level bureaucrats' understanding of citizenships and rights (Oomen & Leenders, 2020; Ball et al., 2012). Furthermore, other studies, which have focused on the role of street-level bureaucrats in the provision of civic integration policies, emphasise in line with Lipsky (2010) that street-level bureaucrats tend to develop their own response repertoire and act upon personal perceptions and preferences (Eriksson & Johansson, 2022; Hagelund, 2010). These studies have, however, given little consideration to institutional settings in which street-level bureaucrats are embedded and the interplay between person-related features and the institutional setting. This thesis fills this gap.

Practical relevance

From a practical point of view, this thesis is also highly relevant. It informs street-level bureaucrats, policy makers, and managers about the way in which street-level bureaucrats interpret and shape policies. This should raise awareness about the way in which policies are formulated and communicated to street-level bureaucrats since street-level bureaucrats can turn different aspects of a policy into a priority, and, thereby, act upon different policy interpretations.

Moreover, the thesis highlights that civic integration policies are facilitated by civic integration consultants in different manners. In particular, civic integration consultants' experience matters and can influence their interpretations and translations. Accordingly, civic integration consultants with extensive job experience are likely to enact civic integration policies in different manners as institutional and actor-centred factors affect them differently in comparison to others who do not have such experience. Thus, also in relation to hiring practices, it is important to consider how institutional and actor-centred factors can influence civic integration consultants' policy enactment as civic integration consultants can also draw.

1.2 The structure of the thesis

To answer the research question, a qualitative research study has been conducted, focusing on the policy enactment of civic integration consultants tasked with the provision of the Civic Integration Act 2021. Civic integration consultants from all over the Netherlands were included within this study to assess how institutional and actor-centred factors influence their policy enactment. For this purpose, the second chapter has delved into the Civic Integration Act 2021 to reflect upon the political implications of the Civic Integration Act and its organisational context. This chapter provides important input to understand how civic integration is currently facilitated by analysing the role of municipalities and civic integration consultants in reference to the act. With the help of these insights, the third chapter introduces two relevant academic debates: *the local turn* and the role of street-level bureaucrats within civic integration research. In reference to these debates, it is clarified how this thesis makes a significant contribution to academic research. The fourth chapter elaborates on the theoretical framework by elucidating the analytical underpinnings on which this thesis is based. Theoretical concepts such as street-level bureaucrats and policy enactment are defined first, before attention is paid to the way in which institutional and actor-centred factors may influence street-level bureaucrats' policy enactment. The fifth chapter engages with the methodology of this thesis by providing a case description, and explaining the overall methodological approach in terms of the data collection methods, operationalisation, and the way in which qualitative data analysis has been conducted. Evidently, within case study research the (external) validity is low since findings tend to be context-bound. This makes it onerous to generalise findings to a large set of units. Accordingly, to

enhance the reliability and validity of this thesis, data has been collected by means of three data collection methods: *document analysis*, *participant observations*, and *semi-structured interviews*. Ten documents, three participant observations, and fourteen interviews have been analysed by means of a qualitative content analysis to corroborate findings across datasets (Oppermann, 2000; Van Thiel, 2015). The sixth chapter presents the most important findings of this thesis. And, within the discussion (chapter 7), these findings are interpreted and analysed so that within the conclusion the research question be answered.

2. Policy & organisational context

This chapter elaborates on the Civic Integration Act 2021 and civic integration consultants' role within its policy provision by elaborating on the policy and organisational context. These insights help to grasp the implications of the academic debates, which are considered within subsequent chapter, and are helpful to interpret the results within chapter seven. For these purposes, the first subsection defines civic integration and civic integration policies, and delves into the efficacy of civic integration policies. The second subsection consist of an analysis of the historical pathway of civic integration policies in the Netherlands so that within the fourth and fifth section the organisational context of the Civic Integration Act 2021 can be analysed by explaining the content of the Civic Integration Act first, and then describing the organisational context through in which the act is facilitated by municipalities.

2.1 Civic integration policies and their effects

Civic integration conveys the notion that citizenship is conditional and, accordingly, refers to two interrelated processes. First, civic integration expresses the idea that newcomers need to become self reliant. This requires the integration and participation of newcomers in all spheres of the recipient society. With the help of civic knowledge, language proficiency, employment, and financial stability, newcomers acquire citizen-like skills like autonomy and self-determination which can empower newcomers to socially, economically, and politically integrate (Ahlén & Boräng, 2018; Careja, 2019; Ellermann, 2020; Goodman, 2010; Goodman, 2014; Goodman & Wright, 2015). And, consequently, civic integration simultaneously fosters cohesion, cultural understanding, and commitment to the host society regarding its social and cultural values, customs, and traditions (Ahlén & Boräng, 2018; Goodman, 2010; Goodman, 2014; Larin, 2020). Thus civic integration is a dual process aiming to enhance the autonomy of newcomers while also fostering commitment toward the host society.

To spur newcomers' integration, civic integration policies are implemented. Civic integration policies are policy instruments, assessment tools, and requirements which aim to enhance civic integration, yet they are *conditional* upon the acquisition of legal statuses regarding entry, residence, and citizenship. Primary examples are civic integration exams and language courses. Noncompliance can hereby induce financial penalties, forfeiture of (access to) social benefits or one's legal status. This means that civic integration policies have an obligatory character (Ahlén & Boräng, 2018; Caponio et al., 2016; Goodman, 2015, Goodman & Wright, 2015; Joppke, 2007b; Kostakopoulou, 2010; Penninx, 2020). They are an "object and instrument of closure" by regulating the in- and exclusion of people simultaneously, although their scope and content varies across countries (Ahlén & Boräng, 2018; Brubaker, In Goodman, 2011, p. 240; Ellermann, 2020, Goodman, 2015; Goodman & Wright, 2015; Joppke, 2007c; Kostakopoulou, 2010; Oomen & Leenders, 2020; De Waal, 2020).

Within academic research, it remains, however, a topic of debate whether civic integration policies spur integration. Few studies indicate that civic integration requirements have a positive effect on integration. Koopmans (2010) stipulates that restrictive integration policies are better capable of enhancing socio-economic integration in comparison to multiculturalist approaches. Hoehne & Michalkowski (2016) conclude that early course participation has a long-term positive effect on language proficiency and social interaction. Other studies, however, point into other directions. Bakkær Simonsen (2017) claims that civic integration requirements do not influence immigrants' sense of belonging. Ersanilli and Koopmans (2011) assessed the impact of ethnic assimilationist, civic assimilationist, and multiculturalist approaches on Turkish immigrants' integration. They did not find substantial differences in outcomes. Goodman and Wright (2015) conclude that immigrant integration is not either positively or negatively affected by obligatory integration requirements. Thus it remains questionable whether civic integration policies spur integration and, if so, whether such policies are better capable of doing so in comparison to other models like multiculturalism.

2.2 Civic integration policies in the Netherlands

Hitherto it remains questionable whether civic integration policies contribute to newcomers' integration. Analysis of civic integration policies in the Netherlands also attests to the limited success of such policies. Civic integration policies were first adopted in the Netherlands in response to failing multiculturalist approaches which were implemented in the 1970s and 1980s to enhance the position of minorities. The *Minorities Bill* facilitated a multicultural society through the emancipation of ethnic minorities within their own "state-supported ethnic infrastructures" (Joppke, 2007a, p. 5; Mattei & Broeks, 2018; Penninx, 2020; Slade, 2010). Immigrants were allowed to retain their culture while welfare-oriented policies and anti-discrimination measures aimed to ameliorate their socio-economic and legal position (Joppke, 2007a; Goodman, 2014). By the 1990s, however, it became evident that multiculturalist approaches had failed as research attested to high levels of unemployment, crime rates, dependency on social welfare, and school dropouts (Goodman, 2014; Joppke, 2007a & 2007b; Mattei & Broeks, 2018).

In response, the Netherlands introduced the 1998 Civic Integration Act for Newcomers (*Wet Inburgering Nieuwkomers*) which aimed to enhance newcomers' self-sufficiency by obliging newcomers to partake in a state-funded twelve-month integration course which consisted of 600-hours of language courses, preparation for the labour market and civic education (Bonjour & Duyvendak, 2018; Goodman, 2014; Joppke, 2007a, 2007b, 2007c; Odé, 2008; Scholten et al., 2019; Slade, 2010).¹

¹ "In a counterpoint to multiculturalism's tendency to lock migrant ethnics into their separate worlds, the opposite goal of civic integration is migrant's participation in mainstream institutions (which came to be labelled as shared citizenship) and autonomy to be achieved through learning the Dutch language and integrating into the labour market" (Joppke, 2007c, p. 249). These policies, however, exclusively apply to family migrants and refugees (Bonjour & Duyvendak, 2018).

Municipalities were responsible for the integration of newcomers. They “held intake meetings with newcomers and sent them to regional educational centres” which were, in turn, responsible for Dutch language courses for newcomers (Scholten et al., 2019, p. 13).

After 9/11, the assassination of Pim Fortuyn in 2002, and the murder of Theo van Gogh in 2004, a more restrictive approach was adopted (Mattei & Broek, 2018; Ryan, 2013; Scholten et al., 2019; Slade, 2010). With the implementation of the Integration Act (*Wet Inburgering*) on January 1st, 2007 a civic integration test had to be passed at a CEFR A2 level within three-and-a-half years (Odé, 2008; Van Oers, 2021).² This regulation applied to all newcomers and settled immigrants (Joppke, 2007a, 2007b; Odé, 2008; Scholten et al., 2019). Those refusing to comply faced financial sanctions or legal consequences like refusal of permanent residency or acquisition of Dutch citizenship (Odé, 2008). The state’s involvement became reduced to the provision of the civic integration exam, whereas newcomer’s level of responsibility increased by obliging them to cover some of the costs of their integration courses. Integration courses, however, became contracted out to private organisations. By privatising the market the government aimed for a competitive market in which the quality of civic integration courses would ameliorate while the prices of the courses would remain low (Joppke, 2007b, Scholten et al, 2019). Yet these changes proved fruitless as integration courses predominantly remained unattended by new- and oldcomers. In response, the Deltaplan was introduced in 2007. Municipalities were given a coordinating role. Municipalities held intakes to inform newcomers about their obligations to the Civic Integration Act, they had to offer state-funded language courses to newcomers, and were authorised to sanction newcomers (Algemene Rekenkamer, 2017; Gijsberts et al., 2012).

The *Civic Integration Act 2013* continued along this trend of self-reliance. State assistance became provided through soft loans. Newcomers were required to participate in civic integration courses at their own expense, and had to arrange them themselves. Moreover, the civic integration exam had to be passed within three years instead of three-and-a-half years upon penalty of residence permit revocation (Goodman, 2014; Rijksoverheid, n.d.b; Scholten et al., 2019). The act, however, was a complete failure as there was no increase in the pass rate of civic integration exams. Instead, the privatisation of civic integration courses paved the way for unscrupulous language schools to deceive newcomers while burdening newcomers with the responsibility of arranging their own integration (Fokkink, 2022; Scholten et al., 2019).

² “In 2007, the naturalisation test was replaced with the more rigorous, modular integration test for settlement”, implicating that the exam became a condition for the obtainment of permanent residence (Goodman, 2014, p. 172).

2.3 The Civic Integration Act 2021

In response to previous policy failure, the Civic Integration Act 2021 came into force on January 1st, 2022. The Civic Integration Act aims for newcomers to reach the highest attainable language level, preferably a CEFR B1 level, in combination with some form of work, and, thereby, spur newcomers' participation and integration in Dutch society as quickly as possible (Blankvoort et al., 2023; Fokkink, 2022; Government of The Netherlands, n.d.). The act applies to status holders and family migrants aged between the age of 16 up to 67 years who are subjected to mandatory civic integration on or after January 1st, 2022 (*see appendix A1*) (Government of the Netherlands, n.d.; Overheid, 2022).³ The Education Implementation Service (DUO), decides who is subjected to mandatory civic integration based on information from the Immigration and Naturalisation Service (IND), another Dutch governmental organisation tasked with the evaluation of applicants who want to live or study in the Netherlands. After obtaining their residence permit, newcomers are assigned by the COA, the central agency for the reception of newcomers that guides and supports asylum seekers, to a municipality within two weeks (Coa, n.d.b). Subsequently, municipalities need to arrange accommodation and administer newcomers within the municipality, before they can enforce the Civic Integration Act 2021 (Coa, n.d.a; Divosa, n.d.c; Rijksoverheid, n.d.a; Jonitz et al., 2022).⁴

At the start of the civic integration process, a comprehensive intake is conducted to explore what kind of support newcomers require to complete their civic integration trajectory. Municipalities need to gather information on newcomers' personal and educational background, job experience, learnability, and degree of self-dependence (VNG, 2022a; Overheid, 2022). Municipalities can organise these intakes in different ways. They can conduct (multiple) interviews or hold group meetings, add additional tests or an intensive supportive programme to the trajectory, etc. (Divosa, n.d.a; VNG, 2022a). Furthermore, a learnability test (*Leerbaarheidstoets: LBT*) is a fixed component of the comprehensive intake which aims to assess whether someone is capable of acquiring a CEFR B1 level of Dutch within three years (Fokkink, 2022; VNG, 2022a). Within ten weeks after a newcomer is assigned to a municipality, and completion of comprehensive intake, the municipality needs to draft a personal integration and participation plan (*Persoonlijk Plan Inburgering en Participatie: PIP*).⁵ This is a municipal order in which all agreements between the newcomer and the municipality are described, the support that will be offered, whether additional services are provided, and which of the three obligatory learning routes will be followed to complete the civic integration trajectory (Divosa, n.d.a & n.d.c; Overheid, 2022; VNG, 2022a).

The learning route is determined by means of insights acquired from the comprehensive intake and the test result of the learnability test. The learning route indicates what kind of language courses

³ Refugees in the possession of a temporary residence permit (The Hague, 2022).

⁴ For asylees, all costs of the integration process are covered by the municipality, whereas migrants have to bear the costs of the civic integration process themselves (Government of The Netherlands, n.d.).

⁵ From that point onwards the civic integration process officially starts and needs to be completed within three years (Overheid, 2022).

the newcomer will attend, the level of Dutch the newcomer will aim to reach, and determines whether a civic integration exam has to be taken. There are three different learning routes: *the self-empowerment pathway*, *the B1 language pathway*, and *the educational pathway* (VNG, 2022a). The B1 pathway is the regular route aiming to let newcomers reach a CEFR B1 level of Dutch and find employment. The educational pathway consist of a “taalschakelproject” preparing newcomers under the age of 27 for an education, and the self-empowerment pathway is for all immigrants who are unlikely to reach a B1 level of Dutch within a time frame of three years. And, subsequently, depending upon the learning route, the municipality arranges status holders (not migrants) language courses so that they can start their integration (Divosa, n.d.a; Government of the Netherlands, n.d.; Van Dam & Brummelkamp, 2020). An overview of the learning pathways' most prominent features can be found in table 1.

Table 1
Three Learning Routes

	Self-empowerment Pathway	B1 Language Pathway	Educational Pathway
Language Level	A1 level	B1 level with the possibility to complete the civic integration exam at an A2 level	B1 level or higher
Target	For clients who won't be able to reach a B1 level of language proficiency within three years	Everyone who can reach a B1 level within three years	People below the age of 30
Purpose	Preparation for participation in Dutch society	Learning Dutch and participating through (voluntary) work	Preparation for further education
Unique features	800 hours of language courses 800 hours of participation activities		
Common fixed components	Module: Knowledge of Dutch Society (KNM) Module: Labour Market & Participation (MAP) Participation	Module: Knowledge of Dutch Society (KNM) Module: Labour Market & Participation (MAP) Participation	Module: Knowledge of Dutch Society (KNM) Module: Labour Market and Participation (MAP) is not obligatory

	Statement Process (PVT)	Statement Process (PVT)	Participation Statement Process (PVT)
Civic integration exam?	No. Final interview with the civic integration consultant	Yes	Yes

Note. Information is provided about the content of the three different learning routes. Data for the learning routes are from *New civic integration act*, by Government of the Netherlands, n.d. (<https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-act>). Copyright n.d. by Government of the Netherlands. Data for the learning routes are from *Handreiking leerroutes*, by Divosa, n.d.c (<https://www.divosa.nl/publicaties/handreiking-leerroutes>). Copyright n.d.b by Divosa.

And, regarding the provision of these different learning routes, municipalities are also responsible for the procurement of language courses, social counselling and financially unburdening of newcomers within the first six months of their civic integration trajectory (Divosa, n.d.c).

2.4 The role of municipalities and civic integration consultants

The previous subsection has highlighted that there are many components of the Civic Integration Act 2021 which need to be taken into account. To gain a better understanding of the implications of the Civic Integration Act, this section elaborates on the role of municipalities and civic integration consultants. As it turns out, municipalities fulfil a coordinating role regarding the enforcement of the Civic Integration Act 2021. This means that they are responsible for the aforementioned mentioned components, housing, financial unburdening within the first six months of the integration process, procurement of language courses, monitoring the integration process and the quality of language courses, and sanctioning (Blankvoort et al., 2023; Overheid, 2022).⁶

To this end, municipalities enjoy a significant amount of policy freedom. They can opt to cooperate with private organisations, civil society organisations, and other municipalities, provide additional services, and outsource services (Blankvoort et al., 2023; VNG, 2022a). For instance, the comprehensive intake can be administered in multiple ways. They can decide when and where (at an AZC, at the office, etc.) they would like to hold the comprehensive intake. Or, municipalities can opt to add additional components to the integration process (Divosa, n.d.a & n.d.c; VNG, 2022a).

Nonetheless, to facilitate these services, civic integration consultants are responsible for most tasks which municipalities have to fulfil regarding the Civic Integration Act 2021. Civic integration consultants hold the comprehensive intake, draft the personal integration and participation plan,

⁶ Municipalities cover fixed costs of status holders within the first six months of their integration process, and this requirement also relates to the Participation Act (Fokkink, 2022; VNG, 2022b). Thus, there is some overlap between the two acts. Sanctions can be imposed in relation to either the Civic Integration Act or the Participation Act (VNG, 2022b).

monitor newcomers' progress through progress reviews, sanction, and make alterations to the personal integration and participation plan if necessary. Thus they exert authority over clients' civic integration trajectory in terms of the learning route which they will follow, sanctions, and customisation. However, as implied beforehand, municipalities enjoy a lot of policy freedom. This means that municipalities can enforce the Civic Integration Act 2021 in different manners and, accordingly, also the tasks, responsibilities and influence of civic integration consultants may vary (Divosa, n.d.a & n.d.c).

Some civic integration consultants are, for instance, exclusively responsible for the provision of the previously mentioned aspects of Civic Integration Act 2021, whereas others are also involved in other aspects of the act like the provision of the MAP or PVT, or are also responsible for the enactment of the Participation Act (*participatiewet*). Moreover, to some degree, there is also an overlap between the Participation Act and the Civic Integration Act since status holders, who are welfare recipients, also need to meet obligations to the Participation Act. This means that they have to make efforts to find employment and integrate and, if they refuse to do so, their social benefits can also be partially cut (Buro voor jou, 2021; Divosa, n.d.b; op den Camp & Le Noble, 2021; Stimulansz, n.d.B; Overheid, 2022).

3. State of the art

The previous chapter highlighted that the efficacy of civic integration policies is questioned within academic research as well as by practitioners. Considering this uncertainty, this chapter concentrates on two academic debates. The first subsection considers civic integration policy practices at the local level by discussing “the local turn” (Caponio et al., 2016; Hepburn & Zapata-Barrero, 2014; Scholten, 2016, p. 975), whereas the second subsection analyses the role of street-level bureaucrats in the provision of civic integration policies. The literature review analyses these streams and illustrates the relevance of this thesis to these academic debates.

3.1 The local turn

Academic research questions the efficacy of civic integration policies, even though many countries rely upon civic integration policies to facilitate newcomers’ integration. Within many countries the enforcement of civic integration policies is decentralised, suggesting a greater role and more responsibility for local authorities. Local authorities are tasked with the implementation of nationally drafted policies, yet they also need to consider the demands arising within their own local contexts (Emilsson, 2015; Zincone & Caponio, 2006). This has sparked scholarly interest in the role of local governments in the formulation, implementation, and enactment of nationally drafted civic integration policies.

This interest is known as the *local turn*. The local turn stresses that cities and regions can become active agents within the policy-making of integration policies by setting their own agenda, producing policy strategies, and formulating local integration policies (Emilsson, 2015; Gebhardt, 2016; Jørgensen, 2012; Oomen & Leenders, 2020; Scholten, 2016; Hepburn & Zapata-Barrero, 2014; Zapata-Barrero et al., 2017). They become “a context of both national policy implementation (top-down approach) and policy redefinition through networks and governance relations (bottom-up approach)” (Caponio et al., 2016, p. 879). This has encouraged academics to debate on the role of local governments within the integration policy-making process which has produced different stances: the *localist dimension thesis*, the *localist thesis* and the *national models thesis* (Dekker et al., 2015).

The localist dimension thesis highlights that local level authorities face similar difficulties in the provision of civic integration policies which “challenge nation-bound policy programmes of integration and instead ask for local input on integration policymaking” (Borkert & Caponio, 2010, p. 13). This means that congruences between local-level integration policy practices are expected as local authorities are theorised to resolve integration problems in similar (pragmatic) kinds of ways (Borkert & Caponio, 2010; Dekker et al., 2015; Mahnig, 2004). Poppelaars & Scholten (2008) lend support to this thesis by stipulating that “local government officials tend to develop strategies and activities to cope with the daily practice of immigrant integration policies” by means of

accommodative policies based on instrumental rationality (p. 348). Vermeulen & Stotijn (2010) maintain that local policy practices are alike since policy come up with pragmatic solutions to accommodate quotidian dilemmas.

In contrast, *the localist thesis* maintains that the local dimension of integration policies is unique, provoking different approaches at the local level. Accordingly, incongruences at the local level and between different levels of governance are expected (Dekker et al., 2015). Kos et al.'s (2016) study lends support to this thesis by demonstrating that Dutch municipalities have developed different courses of action in response to exclusionary national asylum policies. These dictate that rejected asylum seekers are excluded from social welfare services. In response, municipalities have developed, however, a wide variety of practices to cushion and counteract this policy. Some municipalities have obstructed policy execution by supporting individual cases, whereas others provide emergency provisions or other facilities like emergency shelters to rejected asylum seekers.

The national models thesis reasons that local policies are derivative of national models of integration by operating in line with national policies (Emilsson, 2016; Dekker et al., 2015). Some studies attest to the ongoing influence of national models of integration at the local level. For instance, Emilsson (2015) observed in Denmark and Sweden that both central governments increased their control and influence over local policies and practices by means of laws and regulations. These developments have made it onerous for local governments to implement local integration policies (Emilsson, 2016). Furthermore, Dekker et al. (2015) studied integration policies in Berlin, Malmö and Rotterdam. They compared their integration policies on the local level with one another as well as with their national policy contexts. They conclude that local policies are neither more accommodating nor exclusionist towards migrants in comparison to nationalist policies, nor do local policies within these different cities resemble one another. Rather, local policies are congruent with national policy frames.

In sum, it remains a topic of debate what kind of role local governments fulfil in the provision of civic integration policies. Research points in different directions. These studies, however, predominantly assess local policy practices of cities or municipalities. Few studies, however, highlight that civic integration policies are enacted by civil servants who can adhere to different logics. And, in light of these considerations, it is important to engage with civic integration policies by considering the actions of such civil servants first, before general inferences can be made about agency policy (Lipsky, 2010).

The administration of civic integration policies at the local level should, therefore, focus on the individual first, before general inferences can be made about local policy practices. This forms an important step in-between the implementation and provision of civic integration policies since policy-making and implementation occurs at all levels and sites involving negotiations, contestations and struggles between actors as policies rarely dictate a specific course of conduct (Ball et al., 2012)

Hence, this thesis argues in favour of the micro level, focusing on the role of the civic integration consultant, to analyse the overall role of municipalities in relation to nationally drafted civic integration policies. By doing so, the thesis analyses how civic integration consultants enact the Dutch Civic Integration Act 2021. If similar policy interpretations and translations are observed by civil servants within different municipalities, this could, for instance, lend support to the national model or the local dimension thesis, depending upon whether civic integration consultants policy interpretations and translations are in line with nationally drafted policies. Ergo, by delving into civic integration consultants' policy enactment, this thesis makes a significant contribution to this stream of literature.

3.2 Street-level bureaucrats

Michael Lipsky's (2010) of street-level bureaucracy is a widely employed theory within public administration research to assess street-level bureaucrats' role in policy-making. Over the last couple of decades, several streams of literature have evolved around his theory. First, many studies have touched upon the discretionary powers of street-level bureaucrats vis-a-vis successful policy implementation, policy change, entrepreneurship or gate-keeping practices. Second, attention is often paid to identifying determinants of discretionary practices, and, third, to the downsides of new public management on street-level bureaucracy in terms of expectations and accountability (Chang & Brewer, 2022; Nothdurfter & Hermans, 2018). These different debates are also gradually infused into civic integration research.

Academic research attests to the influence of street-level bureaucrats on civic integration policy practices. Street-bureaucrats exert influence over civic integration policies in different ways. First, street-level bureaucrats' background can play an important role. For instance, Oomen and Leenders (2020) draw attention to street-level bureaucrats' role in civic integration policies by demonstrating that street-level bureaucrats' backgrounds play a determinative role in the design of Dutch Participation workshops. Price and Spencer (n.d.) assessed the policy frameworks of welfare policies for migrant families and their implementation. They observed that street-level bureaucrats' convictions regarding belonging and deservingness influenced the provision of welfare benefits. This induced policy variation between street-level bureaucrats as the moral agency of street-level bureaucrats becomes an incentive for the provision of information and help to migrant families. Glyniadaki (2022) argues that street-level bureaucrats' conceptions of their clientele in relation to themselves influences discretionary practices. Ratzmann (2021) observes that German local social administrations' judgments are predominantly guided by identity-based criteria of deservingness.

Second, policy variation is further explained by considering the complex content of the legal and policy frameworks, the lack of training of street-level bureaucrats, gatekeeping (use of difficult language, refusal of applications for social support, and asking for irrelevant documents), and

street-level bureaucrats' discretionary powers (Price & Spencer, n.d.). Eriksson and Johansson (2022) emphasise that street-level bureaucrats struggle with the fact that politically formulated policies do not meet the needs of their clientele. Hagelund (2010) and Eriksson and Johansson (2022) stipulate that street-level bureaucrats, subsequently, develop their own response repertoire concerning integration dilemmas and dilemmas for which policy does not provide solutions. And, in the case of personal distress by clients, and high client motivations and/or dissatisfaction with current policies and policy instruments, street-level bureaucrats may even be inclined to overstep their discretionary powers (Belabas & Gerrits, 2017). These studies signify that street-level bureaucrats background matter and that street-level bureaucrats devise their own response repertoire to manage daily-faced integration dilemmas. This is a complex and dynamic process in which many factors can play a role.

Yet there are still many gaps within the literature which need to be filled. First, Oomen and Leenders (2020) stipulate that academic research has turned a blind eye towards street-level bureaucrats' understandings of citizenship and rights, i.e. how they “are understood and translated differently within different local settings” (p. 270). It remains unclear how street-level bureaucrats conceptualise integration and how this influences their actions. This paper makes a first endeavour to fill this gap by operationalizing policy enactment as a dependent variable. It assesses how street-level bureaucrats interpret the Dutch Civic Integration Act 2021 and, accordingly, fulfil their tasks and duties. This assessment sheds further light on street-level bureaucrats' interpretation of civic integration, and the degree to which this understanding affects their enactment. This two-fold focus deepens street-level bureaucracy theory by considering street-level bureaucrats' interpretations and translations as separate dimensions which can be influenced by different factors and also become disconnected. Accordingly, this thesis delves deeper by considering the interplay between policy interpretation and actions by street-level bureaucrats

Moreover, within public administration research, attention is predominantly paid to the utilisation of discretionary powers to study policy implementation, and within civic integration research attention has been paid to street-level bureaucrats' perceptions and preferences vis-à-vis their policy delivery. The institutional setting in which street-level bureaucrats are embedded and the condition with which they are confronted are, however, often neglected (Chang & Brewer, 2022). Furthermore the interplay between personal perceptions, preferences, and the institutional setting is also given little consideration in relation to the services provided by street-level bureaucrats. This thesis makes a significant academic contribution by considering institutional factors, actor-centred factors, and the extent to which these factors and their interplay shape street-level bureaucrats' policy enactment in terms of street-level bureaucrats interpretation and the way in which interpretations can lead to different ways of policy translation.

4. Theoretical framework

How do institutional and actor-centred factors influence street-level bureaucrats' policy enactment, i.e. policy interpretations and translations? That is the research question which this thesis aimed to answer. For this purpose, this thesis employed a case study which concentrates on the policy enactment of civic integration consultants tasked with the enforcement of the Dutch Civic Integration Act 2021. This called for conceptual groundwork. Accordingly, the notion of street-level bureaucrats' policy enactment is explained within the first subsection while the subsequent subsection engages with the analytical dimensions of this thesis by conceptualising institutional and actor-centred policies which may influence street-level bureaucrats' policy enactment, and subsequently drafting a conceptual framework.

4.1 Street-level bureaucrats' policy enactment

Lipsky's theory of street-level bureaucracy (2010) touches upon the individual within public services by drawing attention to the interaction between frontline public servants, i.e. street-level bureaucrats, and citizens. Street-level bureaucrats are public service workers, e.g. teachers, police officers, civil servants, who represent the government through their provision of public social services to citizens. They directly interact with citizens and, thereby, make important decisions about their clients. These decisions can be either redistributive or allocative by controlling the dispensation of benefits, judging clients' compliance, imposing public sanctions, and exempting clients from penalties (Lipsky, 2010). These discretionary powers are inherent to street-level bureaucrats' jobs and personal preferences as street-level bureaucrats' jobs are complicated. Rules and guidelines cannot cover all aspects of street-level bureaucrats' interactions with clients, nor provide guidance on how to act in every situation (Lipsky, 2010).

Street-level bureaucrats might, therefore, cope with paradoxical job expectations. And, in relation to these different expectations, it is presumed that street-level bureaucrats will resort to different discretionary practices. First, the fact that street-level bureaucrats are required to remain impartial suggests that clients ought to be treated equally. This practice is defined by Brodtkin (2012) as *authorised uses of discretion* which refers to street-level bureaucrats' official tasks and obligations. Street-level bureaucrats need to reach decisions based on formal rules and regulations. However, street-level bureaucrats are also expected to respond to the human dimension of situations through the provision of unique solutions to particular situations, i.e. *unauthorised uses of discretion*, suggesting that street-level bureaucrats can also opt to overstep their own responsibilities (p. 942; Glyniadaki, 2019). This means that discretionary practices can take on different forms. At the same time, this differentiation highlights that, street-level bureaucrats will develop their own standards of deservingness which can induce differences in objectives and orientations, meaning that decisions

made by street-level bureaucrats may, eventually, differ from official policy objectives (Brodkin, 2012; Da Rocha Soares Ferreira & Medeiros, 2016; Lipsky, 2010; Sevä, 2015). Thus street-level bureaucrats enjoy relative autonomy from organisational autonomy, providing them with the opportunity to shape policies. They exercise influence over clients by interpreting rules and policies within an institutional context first, and, subsequently, regulating the allocation of benefits and resources (Lipsky, 1969, 2010; Sevä, 2015).

Further consideration is, therefore, given to Stephan Ball's theory of enactment which considers how actors react to policies and apply them within an institutional environment (Ball et al., 2012; Verger & Skedsmo, 2021). This theory conceptualises policy enactment as a dynamic and non-linear process of policy making. It is collective and collaborative. It involves teamwork, interaction, contestations, negotiations, and cooperation between different actors at different sites and levels. It occurs "through texts, talks, technology, and objects which constitute ongoing responses to policy" (Ball et al., 2012, p. 3). Policy enactment consists of processes of *policy interpretation* and *translation*. This suggests that policy enactment ought to be understood in relation to various documents and policy formulations which are encoded in texts and artefacts and which need to be decoded. Policy ideas and conceptions are abstracted from them and, subsequently, translated within a wide variety of situations and contexts by different actors (Ball, et al, 2012; Ball et al, 2011a, 2011b; Lopes, 2016; Singh et al, 2014).

Thus *policy interpretation* engages with the language of policies. Policy interpretation can be considered as the initial reading and sense-making of policies. What does this text mean? What do I have to do? This process of decoding relates to capturing the fixed sense of a text and emphasises that different points of articulations can become a priority to policy actors (Ball et al, 2012; Lopes, 2016; Verger & Skedsmo, 2021). This process of interpretation can be influenced by several factors since this sense-making occurs at the backdrop of already existing (institutional) commitments, values, interests, and other experiences. Interpretations can, for instance, be shaped by narration. Authoritative interpretations can be presented to staff within meetings to name responsible persons. Texts can serve as a frame of reference or can be attributed to express objectives to which practice ought to be oriented. Enactment will therefore be affected by different readings and is likely to diverge across actors (Ball et al, 2012).⁷

And, these policy interpretations *translate* into the enactment of policies. Words are put into action and abstractions into interactive processes. Institutional texts are drafted and translated into practices within different contexts. Policies become enacted through materials, practices, concepts, procedures, and concepts, suggesting that "translation goes in relation to both imperatives and

⁷ Negotiation, contestation, and struggles between different parties and policy enactments are, therefore, part of policy enactment. For instance, there might be differences in interpretation inducing differences in policy enactments by different policy actors over time and within different spatial contexts. Or, there may be different types of policies enacted simultaneously like official enactments besides informal or undocumented policy practices, contradicting one another (Maguire et al., 2015).

exhortations with different kinds of creativity and spaces for invention and production in each case” (Ball et al., 2011a; Ball et al., 2012, p. 45; Ball, 2015; Ball et al., 2011b, 2012; Braun et al., 2011; Lopes, 2016; Maguire et al., 2015; Singh et al., 2014).). This means that policy translations relate to notions of compliance as well as creativity. Street-level bureaucrats can follow the rules as well as bring their own creativity forward to enact policies.

This theory highlights that the way in which actors interpret policies is key to explicating, how policies unfold into daily practices. Policy interpretation and translation touch upon different aspects within the overall policy-making process. Interpretation involves strategy, whereas translation refers to tactics. Nonetheless, they can intertwine and overlap as “they work together to enrol or hail subjects and inscribe discourse into practices” (Ball et al, 2012, p. 47; Verger & Skedsmo, 2021). Yet they can also become disconnected given that policy actors have their own unique backgrounds in terms of their values, commitments, experiences which need to be translated within different contexts, situations, and various professional subcultures (Ball et al., 2012).

Accordingly, this two-fold focus enables this thesis to study the influence of institutional and actor-centred factors on street-level bureaucrats in-depth since it is presumed that institutional and actor-centred factors can influence street-level bureaucrats’ policy interpretations and translations differently. Policy enactment always occurs at the backdrop of an institutional context in which policy actors also rely upon their own experiences, values etc. Thus, such factors may affect their overall policy enactment. Or, they may influence both aspects differently, and, thereby, also induce some form of disconnection between street-level-bureaucrats’ policy interpretations and translations (Ball et al., 2012). High caseloads, for instance, might solely influence street-level bureaucrats’ policy translations, whereas street-level bureaucrats’ lack of experience may affect their policy interpretations, and, thereby, also their policy translations. Ergo, deeper insights are gained about the influence of institutional and actor-centred on street-level bureaucrats’ policy enactment as opposed to an analysis which would exclusively concentrate on street-level bureaucrats’ discretion.

4.2 Conceptualising institutional and actor-centred factors

Ball et al. (2012) stipulate that three components play a pivotal role regarding policy enactment: the discourse, interpretation, and contexts. The interplay between these factors provides the backdrop for policy enactment (Lopes, 2016). Policies are texts that produce a discourse as policies are often written in an authoritative and persuasive manner, creating a certain reality like street-level bureaucrats and clients. Such policies become interpreted and translated. This process of interpretation can be shaped by interpretations, opinions, experiences, etc. (Ball et al. 2012; Lipsky, 2010). Variation in policy interpretations is, however, dependent on the policy in question vis-a-vis the suffused power

relations at stake, and the constraints and possibilities of contexts like staffing, budgets, buildings, reputations, etc. (Ball et al, 2012).

Considering these aspects, two dimensions are presumed to affect street-level bureaucrats' policy enactment: *institutions* and *actors*. Institutions are “systems of rules” which regulate actors’ behaviour by offering a range of possible courses of conduct. Institutions are characterised by *their work setting* and *informal rules* like social norms and goals that extend, complement, or alter normative expectations regarding rules (Ball et al., 2012; Baycheva-Merger et al., 2018; Scharpf, 1997, p. 38). In contrast, actors are more difficult to conceptualise as they can also behave irrationally. “We know that actors respond differently to external threats, constraints and opportunities, because they may differ in their intrinsic perceptions but also because their intrinsic perceptions may be very much shaped by the specific institutional setting within which they interact” (Scharpf, 1997, pp. 36-37). Therefore, actors are defined by their *capabilities*, *perceptions*, and *preferences* on which they can choose to act (Scharpf, 1997).

Policy processes and policy making are considered in reference to these two dimensions. It is the interplay between actors, with different capabilities, perceptions and preferences, and who are embedded within institutions that influence street-level bureaucrats' policy enactment. And, with the help of this differentiation, several institutional and actor-centred factors are identified within Lipsky’s (2010) theory of street-level bureaucracy and Scharpf’s (1997) theory actor-centred institutionalism.

4.2.1 Institutional factors

Scharpf (1997) avers that policy actors are embedded within institutions. Institutions are, however, difficult to conceptualise since they do not have “a theoretically defined set of variables that could be systematised and operationalized to serve as explanatory factors in empirical research” (p. 39). Rather, Scharpf (1997) argues that institutional factors influence the courses of actions that actors have at their disposal by dictating the options a certain actor may choose from. Accordingly, this thesis differentiates between two subdimensions: *the work setting* and *informal rules* to analyse the influence of institutional factors on street-level bureaucrats' policy enactment.

The work setting refers to the work structure. Street-level bureaucrats operate in an environment that influences their problem perceptions and the possible solutions they can offer, meaning that actions are moulded “by common conditions that give rise to common patterns of practice and affect the direction these patterns take” (Lipsky, 2010, p. 27). They need to make complex decisions about clients, yet working-related conditions can impede their policy enactment. First, a shortage of resources can hinder their decision-making (Lipsky, 1971, 2010). In particular, “organisational resources”, i.e. *the client or cases/street-level bureaucrat ratio*, can form an obstacle. High caseloads and/or staff shortages influence the time street-level bureaucrats have at their disposal for decision-making, and, consequently, their policy translations (Lipsky, 1969, p. 5). “Insufficiency of

organisational resources increases the pressures on street-level bureaucrats to make quick decisions about clients and process cases with inadequate information and too little time to dispose of problems on their merits” (Lipsky, 1971, p. 393). And, furthermore, the notion of *demand meets supply* is also considered to be part of the work setting. Clients rely upon street-level bureaucrats for the provision of public services. Demand for such services can, however, become incessant as demand tends to increase either qualitatively or quantitatively when public services become extended (Lipsky, 2010). Demands for or expectations of public services can either increase over time or fixed clients’ expectations can rise by expecting more and a higher quality of services (Lipsky, 2010).

Accordingly, an extension of public services appears to be beneficial. Lipsky (2010), however, casts doubt on this assumption by arguing that the quality of services, i.e. more time for every case, will probably not improve through the extension of public services. To emphasise this point, Lipsky (2010) differentiates between *inactive* or *active cases*. Inactive cases represent cases that street-level bureaucrats are unable to handle within their daily work routines as opposed to active cases. New employees will eventually have the same number of active caseloads, whereas every worker will have a smaller proportion of inactive caseloads. “More clients will be seen or served, but the amount of actual time spent with the average client will not have improved” (Lipsky, 2010, p. 36). Ergo, increases in capacity translate into service provision at a higher volume, not a higher quality of service as the working conditions can still hinder policy enactment (Lipsky, 2010).

Furthermore, *informal rules* can influence street-level bureaucrats’ policy enactment as they regulate behaviour by requiring, prohibiting, or encouraging certain courses of action (Scharpf, 1997). In particular, conflicting and ambiguous goals and/or expectations can affect street-level bureaucrats’ policy enactment since they can induce different objectives and approaches (Lipsky, 2010). Regarding ambiguity, public service goals are often characterised by the “unattainable goal dimension”, suggesting that certain job expectations are founded upon unfeasible, idealistic expectations making them confusing and complicated to approach (Lipsky, 2010, 1969, p. 8). Different reference groups might have different conceptions of what, for instance, good health or justice entails. Furthermore, “the uncertainty of social service technologies” can also contribute to ambiguity. Uncertainty about what will or won’t work paves the way for different approaches and objectives (Lipsky, 2010, p. 41).

Moreover, Lipsky (2010) argues that three goal-related conflicts can arise. First, client-centred goals can either conflict with social engineering or with organisational goals. In the first case, questions can arise about whether the interests of individuals overrule social objectives. For instance, one can either prioritise the health and well-being of welfare recipients, or focus on eliminating dependency. Within the second case, street-level bureaucrats’ incentive to treat people as individuals can become overrode by organisational goals like the order to process cases as quickly as possible using the limited resources available. And, third, different (role) expectations can be formulated by diverse actors like colleagues or managers, inducing conflicts between these parties (Lipsky, 1969, 1971, 2010).

In response, street-level bureaucrats can alter the expectations about their services adhering to “private goals definition” to bridge the gap between objectives and the institutional setting in which these goals are expressed. By doing so, they adopt a more consistent approach to their work (Lipsky, 2010, p. 144). For instance, a teacher may give precedence to classroom control as the cost of other objectives. This means that the patterns of practice developed by individual workers only make sense according to actors' private goal definition, whereas other reference groups and the public might endorse more complex sets of goals (Lipsky, 2010). This can influence street-level bureaucrats' policy interpretation and/or the way in which they do policy, meaning that ambiguous and conflicting goals can influence both aspects of policy enactment.

In sum, these institutional factors and their interplay can influence street-level bureaucrats' policy enactment, i.e. policy interpretation and translation. The effects of institutional factors are, accordingly, studied by means of three categories. The *clients/ street-level bureaucrats ratio* and notion of *demand meets supply* touch upon the *work setting* in which policy actors are embedded. Both categories can prevent street-level bureaucrats from gaining a comprehensive understanding of their cases and, therefore, impede them from making informed decisions. The client/street level bureaucrats ratio takes the caseload size and composition of street-level bureaucrats into consideration. If interviews indicate that high caseloads affect street-level bureaucrats' decision-making, this indicator is met. Demands meet supply touches upon the extension of public services. If street-level bureaucrats believe that this will not improve the quality of provided services, this indicator is considered to be present. Second, the category of *ambiguous and conflicting goals* aims to shed light on the *informal rules* with which street-level bureaucrats may be coping. Ambiguous and conflicting goals refer to the expectation/goals of different reference groups. If different expectations or goals are upheld by peers and managers affecting the discretion or customisation, this indicator is considered to be present (Camillo, 2017; Lipsky, 2010).

4.2.2 Actor-centred factors

Street-level bureaucrats enact policy by interacting with clients, hereby the previous subsection has already indicated that institutions play an important role (Lipsky, 2010; Scharpf, 1997). The institutional setting can influence actions, perceptions, and preferences, yet not in a deterministic sense since street-level bureaucrats can opt to contravene institutionalised rules. This means that institutional setting can shed light on actors' conduct, but it cannot provide a full-fledged explanation for street-level bureaucrats' actions and how they choose to enact policies (Scharpf, 1997). According to Scharpf (1997), street-level bureaucrats are characterised by their *capabilities*, *perceptions*, and *preferences*. *Capabilities* refer to actions and resources that can be attributed to influence policies.

Lipsky (1969, 2010) stipulates that personal resources like experience, qualifications, information, access to information, and the amount of time available to make, and act upon decisions are important to street-level bureaucrats. Lacking any of these resources can pose a problem to street-level bureaucrats' policy enactment given that street-level bureaucrats need to reach complex decisions about clients (Lipsky 1971, 2010). Especially reliable information can be costly and onerous to obtain in the face of high caseloads, episodic encounters with clients, and the constant pressure for decision-making (Lipsky, 1971, 2010).

Thus, street-level bureaucrats can be under pressure by lacking capabilities, i.e. personal resources, limitations to the work setting and informal rules. Such shortcomings can affect their relationships with clients through the way in which they approach clients and exercise discretion. "The point that they try to do a good job in some way fulfils the requirements for asserting that the problem of street-level bureaucrats is one of decision making under conditions of considerable uncertainty where satisfactory decisions about allocation must be personally as well as organisationally derived" (Lipsky, 2010, p. 82). Under these circumstances, Lipsky (2010, 1969). avers that street-level bureaucrats will either deliberately or unconsciously develop a response repertoire (Mikkelsen et al., 2023). Street-level bureaucrats are inclined to develop patterns of practices and routines to maximise the use of available resources on the one hand, and, on the other hand, ration or limit the demand for services, and/of alter conceptions of their jobs and clientele (Lipsky, 2010; Sevä, 2015). Such responses should be considered in reference to street-level bureaucrats' orientations: *their perceptions* and *preferences* which relate to the status quo, policy problems, their causes, and possible solutions in terms of their efficacy and desirability (Scharpf, 1997).

Perceptions relate to the ideas that people have about policy problems (Scharpf, 1997). Perceptions play an important role vis-à-vis street-level bureaucrats' policy enactment as street-level bureaucrats engage in simplifications. Lipsky (2010) defines simplifications as "mental shortcuts that summarise and come to stand for complex phenomena" (p. 142). Simplifications involve symbolic constructs which street-level bureaucrats utilise to organise their perceptions. Clients and tasks become simplified so that information can be processed and responses developed to reduce complexity, thereby routines are used to reduce the intricacy of tasks and ration services. They secure regularity, accountability and fairness among street-level bureaucrats' clientele and protect street-level bureaucrats from clients' demand. And, subsequently, "routines provide a legitimate excuse for not dealing flexibly since in a limited sense fairness demands equal treatment. Unresponsiveness and inflexibility reinforce common beliefs already present that bureaucracy is part of the problem rather than the solution, and they further reduce clients' claims for service or assertions of need" (Lipsky, 2010, p. 101). Regarding street-level bureaucrats' policy enactment, this means that these simplifications translate into routines. Routines become the policies enacted by street-level bureaucrats (Lipsky, 2010; Ball et al., 2012).

Preferences are actors' inclinations. Several studies demonstrate that street-level bureaucrats' discretionary powers provide them with the opportunity to act upon personal preferences (Keulemans & Van de Walle, 2018; Scharpf, 1997). In particular, street-level bureaucrats may differentiate between clients due to high caseloads and limitations to the working setting. Consequently, they will seek ways to maximise resources by refusing clients, differentiating between clients, and, in particular, attempting to achieve successes with only some clients (Lipsky, 2010). Street-level bureaucrats may differentiate between clients as they may prefer some clients over others, hereby preferences may be based on ethnic or racial appeals, prejudice, or notions of moral worthiness (Lipsky, 2010). Or, street-level bureaucrats might be inclined to favour clients with cooperative attitudes and who are responsive to help. In particular, street-level bureaucrats may engage in creaming practices. *Creaming* is a practice to ration scarce organisational and personal resources by predominantly concentrating on clients who are "most likely to succeed in terms of bureaucratic success criteria" (Lipsky, 2010, p. 107). By doing so, street-level bureaucrats believe that they optimise the utilisation of available resources (Lipsky, 2010). Ergo, street-level bureaucrats can express preferences by differentiating between clients. These practices pave the way for some form of responsiveness and flexibility for some (favoured) clients as street-level bureaucrats cannot provide such services for all of their clients, implicating exclusion of some clients and higher levels of customisation or services for other clients (Lipsky, 2010; Volckmar-Eeg & Vassenden, 2021). This suggests that street-level bureaucrats' preferences can influence their policy interpretations, and, consequently, their policy translations.

In sum, actor-centred factors are considered vis-à-vis street-level bureaucrats' *capabilities*, *preferences* and *perception*. *Capabilities* touch upon street-level bureaucrats' means for policy enactment (Scharpf, 1997). To assess the influence of street-level bureaucrats' capabilities on policy enactment, attention is paid to street-level bureaucrats' personal resources. If street-level bureaucrats indicate that lacking experience or training influences their actions, this indicator is met. Furthermore, attention is also paid to the accessibility of information, and the *time they have for decision-making*. If street-level bureaucrats experience difficulties in finding or accessing information, this indicator is also met (Lipsky, 2010).

In contrast, *perceptions* and *preferences* relate to policy problems, the status quo, the causes of a perceived problem, and the efficacy of possible solutions. These orientations can influence street-level bureaucrats' policy interpretations and policy translations. Street-level bureaucrats tend to rely upon routines and reframing to make their complex tasks manageable. Street-level bureaucrats' *perceptions* will, accordingly, be addressed by analysing the degree to which street-level bureaucrats resort to routines to enact policies, meaning that routines become the enacted policies. Furthermore, street-level bureaucrats' preferences are considered by analysing the way in which street-level bureaucrats prioritise between clients and whether creaming is at stake. If the interviews indicate that

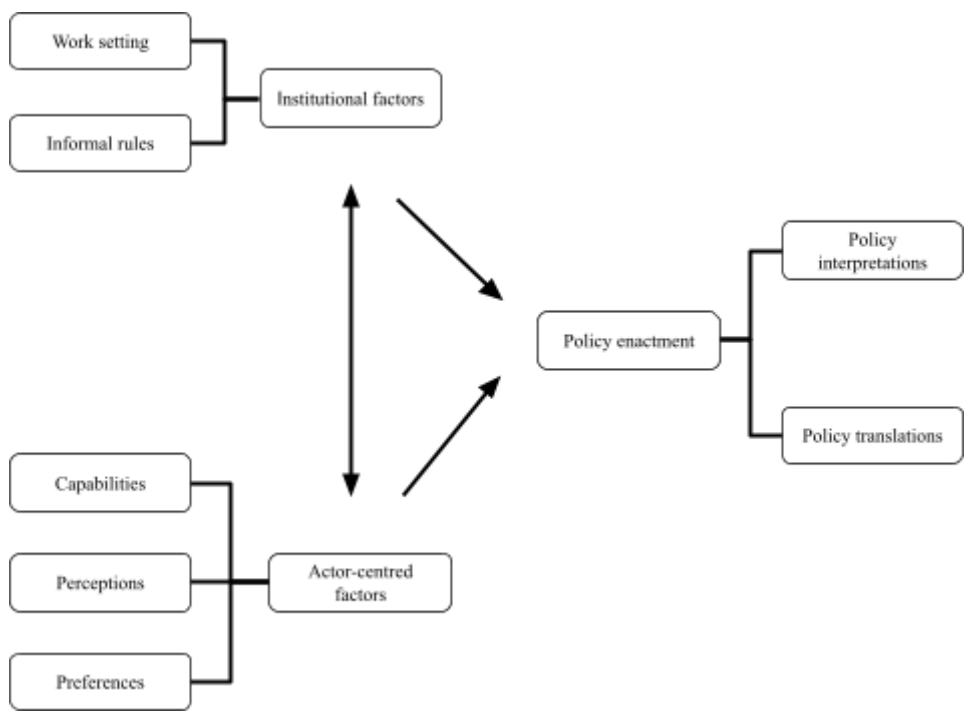
street-level bureaucrats differentiate between clients or engage in creaming practices, this indicator is present (Lipsky, 2010; Scharpf, 1997).

Conceptual model

A conceptual framework has been drafted in which the presumed relationships between institutional factors, actor-centred factors and policy enactment can be found (see Figure 1).

Figure 1

Conceptual Framework



Note. Own compilation based on Lipsky’s (2010) theory of street-level bureaucracy and Scharpf’s (1997) theory of actor-centred institutionalism. The data for the institutional and actor-centred factors are from *Games real actors play: actor-centred institutionalism in policy research*, by F. W. Scharpf, 1997, Westview press. Copyright 1997 by F.W. Scharpf. The data for policy enactment, policy interpretation and translation are from *How schools do policy: policy enactment in secondary schools*, by S. J. Ball, M. Maguire & A. Braun, 2012, Routledge. Copyright 2012 by Ball et al.

The figure highlights that there are three dimensions (*policy enactment, institutional, and actor-centred factors*) and seven subdimensions. The dependent variable is street-level bureaucrats’ policy enactment which consists of two subdimensions: policy interpretations and translations (Ball et al., 2012). It is theorised that both can be influenced by institutional as well as actor-centred factors. The institutional dimension consists of two subdimensions: the work setting and informal rules. Both subdimensions are presumed to influence street-level bureaucrats’ policy enactment. The actor-centred dimension is characterised by three subdimensions: street-level bureaucrats’ capabilities,

preferences and perceptions (Scharpf, 1997). These subdimensions can also affect street-level bureaucrats' policy enactment. At the same time, it is, however, presumed that the interplay between institutional and actor-centred factors also plays a pivotal role. For instance, street-level bureaucrats may be encouraged to engage in creaming practices in response to limitations to the work setting such as high caseloads (Lipsky, 2010). Accordingly, the subsequent chapter explains the methodological approach of this thesis and explicates how this conceptual model is operationalised.

5. Methods

To analyse the effects of institutional and actor-centred factors on street-level bureaucrats' policy enactment, this thesis resorted to a qualitative research design. Qualitative research methods provide thick descriptions of respondents' perceptions, opinions, and experiences which are much needed to assess street-level bureaucrats' policy enactment, and the influence of institutional and actor-centred factors. Such descriptions pave the way for an in-depth investigation into the complex linkages between institutional and actor-centred factors, and street-level bureaucrats' policy enactment which is an important step towards tracing causal relationships (Gschwend & Schimmelfennig, 2007; Rahman, 2016; Widner et al., 2022).

The theoretical framework suggests that institutional and actor-centred factors influence policy enactment. These factors are analysed to unearth their effects on street-level bureaucrats' policy enactment, meaning that the thesis resorted to an outcome-centric research design, i.e. y-centric research. The focus laid on explaining street-level bureaucrats' policy enactment through exploratory research in which theory-testing also plays a role (Gschwend & Schimmelfennig, 2007). Accordingly, a typical case study has been employed. Case study research contributes to gaining knowledge about social phenomena by being context-sensitive. A typical case study, i.e. a case study in which a representative case of a population of cases is studied, however, also lends itself to "contingent generalisations" (Bennet, 2022, p. 66; Crowe et al., 2011; Gerring, 2007).

The object of this case is street-level bureaucrats' policy enactment. The case study focused on the policy enactment of civic integration consultants tasked with the enforcement of the Civic Integration Act 2021 to scrutinise the influence of institutional and actor-centred factors on street-level bureaucrats' policy enactment. They are the subjects of this case study (Thomas, 2016). These subjects were studied by resorting to three methods of data collection: *document analysis*, *participant observations*, and *semi-structured interviews* so that a content analysis could be conducted with the help of abductive reasoning. Abductive inference allows for a middle-ground approach in which inductive and deductive approaches both play a role. Not only are existing theories tested, but attention is also paid to the discovery of new patterns to foster theory development (Dubois & Gadde, 2002; Conaty, 2021; Van Thiel, 2015). Within the subsequent sections, the overall structure of the methodological approach is explained by elaborating on the case study, the data collection methods, the operationalisation, the data analysis, and reliability and validity of this thesis.

5.1 Case description

To learn more about street-level bureaucrats' policy enactment, this thesis resorted to a single case study that focused on civic integration consultants' policy enactment in the context of the Dutch Civic Integration Act 2021. As mentioned in the chapter two, these civic integration consultants are

responsible for the enforcement of the Dutch Civic Integration 2021 Act by determining clients' learning routes, monitoring their progress, sanctioning them, and making alterations to their personal integration and participation plan if necessary. And, through interactions, they make policy. This implies that civic integration consultants are a primary example of street-level bureaucrats and, accordingly, the subjects of this case study (Thomas, 2016).

Municipalities, however, enjoy a lot of policy freedom regarding the implementation of the Civic Integration Act 2021. Municipalities can choose to outsource (aspects of) the act, cooperate with other organisations and municipalities, provide additional services, etc. (Blankvoort et al., 2023; VNG, 2022a). Thus different rules and regulations apply, meaning civic integration consultants are embedded within unique institutional environments. This makes it challenging to identify causal relationships in relation to street-level bureaucrats' policy enactment. The combination of different factors might influence street-level bureaucrats' policy enactment in either different or similar manners, meaning that equifinality as well as multifinality might be at stake (Cicchetti & Rogosch, 1996). To address this issue and secure some representativity, civic integration consultants from different sized municipalities spread around the Netherland have been included. If similar patterns are observed, this lends strong support for the identification of causal relationships (Gerring, 2007). Accordingly, a division has been made between large, medium-sized, and small municipalities. This classification is based on the M50's (n.d.) classification of middle-sized municipalities. An overview of the division and the respondents can be found in the table below.

Table 2
Civic Integration Consultants from different municipalities

Number	Size of the municipality	Inhabitants	Amount of municipalities involved	Amount of respondents
1	Large	> 80.000	4	4
2	Middle sized	30.000 - 80.000	4	8
3	Small	< 30.000	2	2

N = 14

Note. The differentiation between the different sizes of the municipalities is based on the amount of inhabitants which live within municipalities. This differentiation based on Over M50, by M50, n.d. (<https://www.middelgrotegemeenten.nl/strag+m50/default.aspx>). Copyright n.d. by M50.

Four respondents from large municipalities, eight from medium-sized municipalities, and two from small municipalities were included within this thesis, suggesting that small municipalities were underrepresented.

5.2 Data collection

It is challenging to make general inferences by means of a single case study. To overcome this difficulty, the informed decision has been made to rely upon three different data collection methods, i.e. methodological triangulation, to analyse the effects of institutional and actor-centred factors on civic integration consultants' policy enactment: *document analysis*, *participant observations* and *semi-structured interviews*. Data has been collected in the period of December 2022 until March 2023. First, the document analysis has been conducted to become familiar with the specifics of the Civic Integration Act. And, subsequently, participation observations and semi-structured interviews have been conducted to gather a rich data set. The document analysis and participant observations serve as complementary data to the semi-structured interviews to corroborate findings as within the anonymous interviews a social desirability bias might be at stake. Accordingly, methodological triangulation enhances the validity of this thesis if findings can be corroborated across datasets (Oppermann, 2000; Van Thiel, 2015). The subsequent subsections elaborate on these data collections methods.

5.2.1 Document analysis

This thesis relied upon document analysis as a data collection method since there is a lot to gain from conducting document analysis. First, the selected documents have been used as means to learn more about the specifics of the Civic Integration Act which also helped to formulate follow up questions within the semi-structured interviews. And, second document analysis has been attributed to verify and corroborate findings from other sources. By reading, assessing, and interpreting text findings can be corroborated across datasets and reduce possible bias, and, thereby, enhance the reliability of findings (Bowen, 2009).

For these purposes, nine documents were selected (*see appendix E*). Selection of the documents focused on the content of documents, i.e. the extent to which documents referred to the Civic Integration Act 2021 and the domain, i.e. context in which the participating civic integration consultants operate and the role of civic integration consultants (Bleijenbergh, 2013). The selected documents are exclusively published by municipalities which respondents who also participated within the semi-structured interviews. Some of these documents completely covered the Civic Integration Act, and others specific aspects of the act. They include powerpoints presentations, ordinances etc. An overview of these documents can be found in *appendix B*. However, because all participants of the semi-structured interviews will remain anonymous, the exact titles of the selected documents for the document analysis will not be provided since these can provide clues about the identity of respondents as well as their municipalities (Bowen, 2009). The main disadvantage of document analysis is, however, the fact that documents were drafted for another purpose than the

attributed research. This meant that information within these documents did not directly relate to the topic under study. Accordingly, efforts were made to include documents which directly related to policy enactment by civic integration consultants (Van Thiel, 2015).

5.2.2 Participation observations

Participant observations were included as a data collection method. Participant observations are a “systematic description of events, behaviours and artefacts in the social setting chosen for study” (Marshall & Rossman, 1989, p. 79). The primary advantage of participant observations is the fact that they enable researchers to observe people within their natural setting (Kawulich, 2005). Within this case study, it is, therefore, important to include participation observations. Because the Civic Integration Act 2021 took effect on January 1st, 2022 implies that there was little information available about the specifics of the act, its implementation, and enforcement by municipalities. Accordingly, participant observations helped to gain a holistic understanding of the act, and civic integration consultants’ roles and dilemmas (Dewalt & Dewalt, 2002; Government of the Netherlands, n.d.).

Three freely accessible online meetings⁸ which were hosted by Divosa (n.d.d), an organisation which connects and informs professionals operative within the social domain, were frequented for or the use of a participant observation based on their availability and easy accessibility within the data collection period of December 2022 until April 2023.⁹ An overview of these meetings can be found in the table below.

Table 3

The participant observations

Number	Topic	Organisation	Duration	Date
1	Learnability test	Hosted by Divosa	2 hours	15.12.2022
2	Participation hours z route	Hosted by Divosa	2 hours	21.02.2023
3	Module: Labour Market & Participation (MAP)	Hosted by Divosa	2 hours	28.03.2023

N = 3

⁸ Divosa was contacted in advance to ask for permission to attend these meetings.

⁹ No meeting was hosted by Divosa in January 2023.

Within these online meetings, challenges and information gaps vis-a-vis the Civic Integration Act 2021 were discussed by stakeholders such as municipalities, policy makers, and civic integration consultants. Thus these meetings were most suitable to incorporate within this research as they provided valuable insights into the challenges, unclarity and frustrations that civic integration consultants face in the course of their jobs. Furthermore, these participation observations also provided the researcher the opportunity to check definitions, and compare descriptions to those of respondents within the semi-structured in terms of distortions, inaccuracies or the social desirability bias which is inherent to interviews (Kawulich, 2005; Marshall & Rossman, 1989; Van Thiel, 2015).

Upon accessing these meetings, participants were required to write down their full names and include their organisation so that it was clear which parties and municipalities were represented within these meetings. Accordingly, the researcher's name and university were visible to participants. However, no explicit statement was made about the intentions of the researcher, nor did the researcher play an active role within these meetings which always started with two short presentations on a specific topic followed by a question round and discussion among participants. These presentations and discussions were *exclusively* observed. The researcher remained silent and did not interact with participants. Accordingly, it can be presumed that participants were left in the dark about the conduction of these participant observations, suggesting that observations took place in an unobtrusive manner (Bleijenbergh, 2013; Kawulich, 2005).

Observation concentrated on the content, i.e. what was said during the meeting or written down within the chat. Particular attention was paid to behaviour which fit or contradict theoretical assumptions (Kawulich, 2005). However, not all theoretical dimensions could be studied by means of this form of data collection method as only specific aspects of the Civic Integration Act were covered within these meetings. Accordingly, these participant observations were attributed to measure some indicators like policy enactment, information and access to information, and ambiguous and conflicting goals. And, after every meeting a report was compiled.

5.2.3 Semi-structured interviews

Besides document analysis and participant observations, data has also been gathered through semi-structured interviews. This type of interview is a suitable approach to gather information about institutional factors, civic integration consultants' capabilities, perceptions, and preferences vis-a-vis their policy enactment. Semi-structured interviews can shed light upon civic integration consultants' conceptions and struggles as it provides them with the opportunity to be open about their jobs and experiences within a private and safe environment, hereby follow-up questions can also be formulated. Accordingly, interview questions were formulated in advance with the help of a previously drafted interview guide which was based on the operationalisation of variables from the

theoretical framework so that all factors were covered within the interviews (Adams, 2015; Van Thiel, 2015).

And, to enhance the quality of the data to be collected within the semi-structured interviews, two exploratory interviews were held in advance. More information about these interviews can be found in the table below.

Table 4

The exploratory interviews

Interview number	Date	Job title	Duration
1	29.12.2022	Civic integration consultant	2 hours and 15 minutes
2	19.01.2023	Consulent status holders	1 hour and 51 minutes

$N = 2$

These exploratory interviews were conducted to learn more about the specifics of the Civic Integration Act 2021 and the institutional setting in which civic integration consultants are embedded. Furthermore, the answers of the exploratory interviews have been assessed to analyse whether the formulated interview questions adequately covered all indicators (*see appendix B*), and provided insights into the expected causal mechanisms. The analysis indicated that some questions regarding required refinement. This eventually resulted in a new interview guide (*see appendix C*). In particular, questions about the perceived level of quality of services were included as an indicator of policy enactment to gain more insights about civic integration consultants' policy enactment out of concern that customisation and discretion would be two sides of the same coin in terms of policy enactment. Furthermore, the decision was made to alter the formulation of some questions into open questions to gain more qualitative data (*see appendices B & C*).

Subsequently, municipalities from all over the Netherlands were contacted by phone and email to ask whether civic integration consultants were willing to participate within this thesis. Within this process, attention was paid to the location and size of municipalities to guarantee that civic integration consultants from different-sized municipalities across the Netherlands were represented. At the beginning, no municipalities were found willing to participate for a wide variety of reasons. Lack of time was often given as a reason for being unable to participate. Accordingly, the researcher revised its approach by highlighting over the phone and by email that anonymity would be guaranteed to respondents, and sending municipalities a list of the questions and an information document in advance (*see appendices C & D*) so that respondents knew what they could expect from the interview. This resulted in the fact that some civic integration consultants were eventually found willing to

participate. The civic integration consultants are hereby the units of observation of this research, meaning that each civic integration consultant is as an object of comparison which takes a particular value that is, eventually, submitted to comparison (Leuffen, 2007). An overview of the conducted semi-structured interviews can be found in the table below.

Table 5

The semi-structured interviews

Interview Number	Date	Job Title	Organisation	Duration
1	24.01.2023 07.02.2023 09.03.2023	Civic integration consultant	Large municipality	57 minutes 1 hour and 11 minutes 36 minutes
2	27.01.2023	Custom manager work and income	Small municipality	2 hours and 29 minutes
3	20.02.2023	Work and income consultant	Medium sized municipality	2 hours and 32 minutes
4	28.02.2023	Civic integration director	Medium sized municipality	1 hour and 17 minutes
5	28.02.2023	Civic integration director	Medium sized municipality	1 hour and 17 minutes
6	06.03.2023	Civic integration consultant	Medium sized municipality	Written
7	06.03.2023	Civic integration consultant	Medium sized municipality	1 hours and 7 minutes
8	06.03.2023	Civic integration consultant	Medium sized municipality	1 hours and 34 minutes
9	07.03.2023	Consultant and coach	Medium sized municipality	1 hours and 51 minutes
10	07.03.2023	Consultant and coach	Medium sized municipality	1 hours and 51 minutes
11	09.03.2023	Civic integration consultant	Large municipality	1 hour and 15 minutes
12	15.03.2023	Civic integration consultant	Small municipality	1 hour and 15 minutes
13	17.03.2023	Civic integration consultant	Large municipality	1 hour and 35 minutes
14	27.03.2023	Civic integration	Large	1 hour and 37

Fourteen civic integration consultants were eventually found willing to participate. These respondents were from the east, middle, and north of the Netherlands, meaning that no respondents from the west and south of the Netherlands are included within this thesis. Three of them were male and eleven of them were female. Two interviews were held with two civic integration consultants at the same time, and one of the interviews took place via a zoom meeting. All other interviews were held face to face at town halls, and only one interview was conducted in a public library.

Interviews took approximately one-and-a-half hours and were all structured in a particular manner to secure replicability and validity (Van Thiel, 2015). First, the researcher introduced herself. Then interviewees were informed about the topic of this thesis by telling them that the researcher was interested in factors which might influence their provision of services. Subsequently, the setup of the interview and confidentiality of the research were discussed. Respondents were promised that no names would not be mentioned, and, subsequently, respondents were asked to sign an agreement which authorised the researcher to record and transcribe these interviews so that these transcriptions could be analysed. All participants agreed to these terms and signed this agreement. Then, the interview started. Within all interviews, respondents were first asked to introduce themselves, before specific questions about their policy enactment and related institutional and actor-centred factors were posed. Depending upon respondents' answers, some questions were skipped as they were indirectly already answered, follow-up questions were formulated, and the order of questioning was sometimes revised so that all dimensions would be equally covered over the course of the interviews. All interviews were eventually transcribed by the researcher.

5.3 Operationalisation

Data has been collected by means of three different data collection methods. This data collection process was directed by the conceptual framework (*see chapter 4.2*) which was developed within the theoretical framework. To study this conceptual model, it is, therefore, important to explain how these analytical dimensions have been translated into empirically observable indicators first. Accordingly, within the following subsections the operationalisation of these three dimensions (*policy enactment, institutional, and actor-centred factors*) and seven subdimensions are delineated, starting with the operationalisation of *policy enactment*, the dependent variable, and followed by independent variables: *institutional* and *actor-centred factors* (*see appendix F*).

5.3.1 Policy enactment

Ball et al. (2012) maintain that policy enactment is a dual process consisting of *policy interpretations* and *policy translation* (Ball et al., 2012). Accordingly, to study street-level bureaucrats' policy enactment, attention needs to be paid to street-level bureaucrats' policy interpretations and translations. Both subdimensions were operationalised.

Policy interpretations

Ball et al. (2012) highlight that policy interpretations refer to the initial reading and decoding of policies in terms of one's tasks and responsibilities, hereby different aspects can become a priority. Within this case study, it is, however, onerous to assess civic integration consultants' initial reading of the act. The Civic Integration Act took effect on January 1st, 2022, meaning that civic integration consultants' initial readings and policy interpretations might have already changed as interpretations are fluid, and can be altered, recontextualised, or revised over time. Notwithstanding these difficulties, civic integration consultants' description of the Civic Integration Act 2021 served as an indicator to analyse civic integration consultants' policy interpretations as it was presumed that civic integration consultants' descriptions of the act also shed light on the aspects which they deem most important.

And, to measure this indicator, this thesis relied upon the document analysis, participant observations and semi-structured interviews. Within the semi-structured interviews civic integration consultants were asked to describe the most important features of the act, the objectives of the act, and to describe their main tasks and responsibilities in relation to the act, whereas the document analysis and participant observations concentrated on civic integration consultants' descriptions of the Civic Integration Act (*see appendix C*).

Policy translations

Policy translation refers to *doing* policy (Ball et al., 2012). Considering Lipsky's (2010) theory of street-level bureaucracy, this means that street-level bureaucrats make policies through their interactions with clients. The same can, accordingly, be said for civic integration consultants. They make policy through their interactions with clients. Within these interactions, civic integration consultants reach decisions about clients and can opt to provide additional services. It is, however, impossible to gain an adequate overview of all the ways in which policies and services are enacted by civic integration consultants. Accordingly, the thesis focused on two indicators, which are inherent to civic integration consultants' tasks and responsibilities, to assess civic integration consultants' policy translation: civic integration consultants' *perceived level of discretion* and *customisation*. At first glance, these two indicators appear to be two sides of the same coin. This is, however, not the case.

The perceived level of discretion refers to the way in which civic integration consultants perceive their own discretionary powers, i.e. the amount of leeway they think they have. It does *not* focus on civic integration consultants' discretionary powers from an institutional point of view, but on their policy translation in terms of the extent to which they choose to exercise discretion to do policy. The operationalisation touches upon the degree to which civic integration consultants maintain that they believe that they *can make decisions independently, have freedom to do their jobs, and perceived authority to sanction* clients and, thereby, shape policy-making, irrespective of civic integration consultants' official authority, rules and regulations. For instance, the question of whether they choose to sanction clients or go against rules and regulations matters, not the question of whether they have the authority to do so. And, depending upon civic integration consultants' answers, a differentiation was made between low, medium and high discretionary practices (*see appendix F*) (Lipsky, 2010).

Perceived level of customisation relates to the extent to which civic integration consultants believe that they can provide customisation. Customisation can be provided in a wide variety of ways, and, to some degree, one might argue that by choosing to exercise a high degree of discretion, customisation can be provided. Accordingly, it appears that the notion of customisation is an extended notion of civic integration consultants' perceived discretion. However, there is more than meets the eye. Customisation involves creativity. For example, the fact that a broad intake has to be conducted, does not say anything about *the way* in which a broad intake has to be conducted. Civic integration consultants can provide these services by also taking the needs of clients into account, employing cultural sensitive skills, or conversing with clients in their mother tongue. Ergo, the focus laid on the way in which civic integration consultants think that they can provide customisation and, accordingly, do so. Accordingly, the interview questions aimed to assess this indicator by asking civic integration consultants about the degree to which they provide customisation, and offer customary services to clients. Subsequently, a differentiation was made between the degree to which civic integration consultants' provide customisation (*see appendix F*).

These indicators were considered to be representative indicators to assess civic integration consultants' policy translation. An overview of the operationalisation of policy enactment can be found in the table below.

Table 6*Policy enactment*

Variables	Category	Subcategory	Indicator(s)	Data collection method(s)
Policy enactment	Policy interpretation	Policy conception	Civic Integration consultants' description of the Civic Integration Act 2021	Document analysis, participant observations, semi-structured interviews
	Policy translation	Doing policy	Perceived level of discretion	Semi-structured interviews
			Perceived level of customisation	Semi-structured interviews

5.3.2 Institutional factors

The theoretical framework differentiates between *the work setting* and *informal rules*. Both have explanatory value by impeding, regulating, requiring, prohibiting, or permitting certain policy interpretations and translations (Scharpf, 1997). These two subdimensions were operationalised by means of some of Lipsky's (2010) aforementioned limitations: *clients/ street-level bureaucrats ratio*, *presumed impact of hiring additional staff*, and *ambiguous and conflicting goals of reference groups*. *The work setting* highlights that civic integration consultants are embedded within institutions. To assess its influence on street-level bureaucrats' policy enactment, attention was paid to the *case/street-level bureaucrat ratio*, and the notion of *demand meets supply*. The client/street level bureaucrats ratio takes civic integration consultants' caseload sizes into consideration as it is presumed that extensive caseloads deprive street-level bureaucrats of the opportunity to reach informed decisions (Lipsky, 2010). If interviews or participant observations indicate that high caseloads affect civic integration consultants' decision-making or extent to which they can provide customisation, this indicator is met.

Demand meets supply also refers to the caseload size. Lipsky (2010) avers that extending public services or hiring additional staff will not lead to improvement of the quality of services as only a higher volume of clients will be served, whereas the time spent with the average client will, however, not increase. Furthermore, other actor-centred or institutional factors can still obstruct street-level bureaucrats' policy enactment. This makes it unlikely that an additional staff will have a positive influence on street-level bureaucrats' policy enactment, and their policy translations in particular. This indicator is considered present if civic integration consultants believe that hiring additional staff will

not affect their discretionary and customary practices, or impedes them from exercising discretion or providing customisation

In contrast, *informal rules* were operationalised by considering the presence of *ambiguous and/or conflicting goals and expectations*. For instance, a manager may expect a civic integration consultant to meet certain deadlines while colleagues expect them to pay attention to the personal circumstances of clients. Such expectations can be contradictory (Lipsky, 2010; Scharpf, 1997). Accordingly, interview questions asked interviewees about managers’ and colleagues’ expectations, whereas participant observations considered the degree to which different expectations were expressed. If different expectations were upheld by managers and colleagues, and the respondent highlights that he or she struggles to do his/her job in terms of exercising discretion or providing customisation, this indicator is present. Furthermore, if civic integration consultants either describe the Civic Integration Act 2021 in accordance with managers’ or colleagues goals and/or expectations, or state that these goals and expectations influence their discretion or customisation, it suggests that informal rules influence street-level bureaucrats’ policy interpretations and/or translations. An overview of the operationalisation of these dimensions can be found in the table below.

Table 7

Institutional factors

Dimension	Subdimensions	Operationalisation	Indicator(s)	Data collection method(s)
Institutional factors	Work setting	Case/street-level bureaucrat ratio	Impact of caseload size	Participant observations, semi-structured interviews
		Demand meets supply	Presumed impact of hiring practices	Semi-structured interviews
	Informal rules	Ambiguous and conflicting goals and expectations	Managers’ and colleagues’ goals and expectations	Participant observations semi-structured interviews

5.3.3 Actor-centred factors

Street-level bureaucrats are characterised by their *capabilities, preferences, and perceptions* play an important role (Scharpf, 1997). Accordingly, further consideration has been given to these three subdimensions vis-à-vis civic integration consultants’ policy enactment. An overview of the operationalisation of these different subdimensions can be found in the table below and requires further clarification.

First, the influence of street-level bureaucrats' *capabilities* on policy enactment was operationalised by means of civic integration consultants' personal and action resources like experience, qualifications, (access to) information, and time for decision-making. Civic integration consultants can resort to these different indicators to do policy. However, a shortcoming of any of these resources is also theorised to influence their policy interpretations and translations (Scharpf, 1997, Lipsky, 2010). If civic integration consultants indicate within the document analysis, participation observations or the semi-structured interviews that they lack any of these resources to do their jobs, i.e. make policies, in the sense that they cannot make informed decisions about their clients (discretion) or provide customisation, this indicator is present. Or, if civic integration consultants stress that any of these capabilities helps them to lay priority on specific aspects of the Civic Integration Act, i.e. their policy translations, this indicator is met.

Second, *perceptions* relate to actors' conceptions in terms of policy problems (Scharpf, 1997). Street-level bureaucrats may engage in simplifications to reduce the complexity of their jobs. In particular, street-level bureaucrats can resort to routines to simplify tasks and make their jobs manageable. These routines can eventually become the services provided by street-level bureaucrats and aid to ration services in the sense that secure regularity and fairness among street-level bureaucrats' clients and, thereby, protecting street-level bureaucrats from clients' demands (Lipsky, 2010). This means that street-level bureaucrats' routines prevent them from providing customisation and/or exercising discretion and can also alter the way in which street-level bureaucrats conceptualise policies, i.e. their policy interpretations. Thus, if civic integration consultants either indicate that their weekly or daily routines influence their decision-making/their customisationary services (policy translation), or highlight a direct relation between these routines and their descriptions of the civic integration in the sense that the content of the routines overlaps with their descriptions of the Civic Integration Act, this indicator is deemed present.

And, third, street-level bureaucrats' *preferences* are operationalised in terms of the way in which they prioritise between clients, suggesting that some clients are favoured over others. And, in particular, it is assessed whether creaming is at stake (Lipsky, 2010; Scharpf, 1997; Volckmar-Eeg & Vassenden, 2022). This means that customisation can be provided to limited degrees by singling out certain clients and bestowing special attention or additional services upon them at the cost of other clients. If street-level bureaucrats predominantly prioritise by focusing on particular clients or clients who are likely to succeed rather than difficult cases, this indicator is present.

Table 8*Actor-centred factors*

Dimension	Subdimensions	Operationalisation	Indicator(s)	Data collection method(s)
Actor-centred factors	Capabilities	Personal and action resources	Experiences, qualifications, access to information, amount of time available for decision-making	Participant observations, semi-structured interviews
	Perceptions	Simplifications	Weekly and daily routines	Semi-structured interviews
	Preferences	Prioritisation	Prioritisation between clients & creaming	Semi-structured interviews

5.4 Data analysis

Qualitative research has been conducted by means of a typical case study which focused on the civic integration consultants' policy enactment. Civic integration consultants from all over the Netherlands and different-sized municipalities were included to provide a differentiating view of policy enactment within different contexts. The effects of different institutional and actor-centred factors on civic integration consultants' policy enactment were studied through qualitative content analysis to observe patterns and produce explanations for observed patterns (Zhang & Wildemuth, 2005)

Within this content analysis, this thesis resorted to an abductive logic of inference to code data. Abduction conveys the notion that conducting research is a dynamic process in which an interplay between data, theory and the research is present. Data is perpetually analysed vis-a-vis different theories, and, accordingly, can contribute to existing theory. This is a most suitable approach as it facilitates an interplay between the researcher, empirical data, and theory, providing researchers with the opportunity to discover new variables and other relationships besides theoreticized ones (Conaty, 2021). This means that inductive and deductive approaches both played a role. Theory facilitates the investigation of phenomena by closely examining individual observations. This scrutiny can ultimately lead to plausible inferences which, in turn, contributes to the development and/or refinement of existing theories (Dubois & Gadde, 2002; Conaty, 2021). Categories and dimensions can either be developed from theory or data. Thus, the theoretical framework on institutional and actor-centred factors provided an analytical basis for studying civic integration consultants' policy enactment. "This approach creates fruitful cross-fertilization where new combinations are developed through a mixture of established theoretical models and new concepts derived from the confrontation with reality" (Dubois & Gadde, 2002, p. 559).

The coding process

To incorporate abductive inference within the qualitative data analysis, this thesis resorted to deductively coding the data first. A code is “a word or short phrase that symbolically assigns a summative, salient, essence-capturing, and/or evocative attribute for a portion of language-based or visual data” (Saldaña, 2013, p. 3). The coded piece is an instance of something else and is attributed a certain meaning within a systematic order. Codes can become recoded, grouped, and regrouped. And, with the help of these codes, patterns can be identified within data sets. Hereby, it should be emphasised that this is first an interpretative process, meaning that coding decisions can be influenced by the researcher’s bias (Saldaña, 2013). Accordingly, it is important to be transparent about the coding process for the purpose of replicability and validity reasons.

Within this thesis, data was coded manually. Within the first coding cycle, data was coded by means of initial coding, meaning that data was divided into smaller parts and, subsequently, intensively compared, conceptualised and categorised so that codes can be developed (Saldaña, 2013; Van Thiel, 2015; Vollstedt & Rezat, 2019). In particular, the participant observation records and some interview transcripts were initially coded vis-à-vis the three dimensions (*policy enactment, institutional factors* or *actor-centred factors*), their subdimensions, and their associated indicators. These insights shed light on the content and nuances of the collected data (Saldaña, 2013). Subsequently, a code book was drafted by means of the previously described indicators, i.e. deductive reasoning (*see appendix F*) as well as by means of in vivo coding, i.e. using data derived descriptions (Vollstedt & Rezat, 2019). All codes were aimed to be mutually exclusive and exhaustive (Van Thiel, 2015).

With the help of the code book, the second coding cycle attributed codes to all collected data. First the interview transcripts were coded, then the participant observations, and documents. Sometimes codes had to be refined by creating additional codes due to in vivo coding. Accordingly, all data was coded twice. This eventually led to an excel spreadsheet in which all codes were saved. With the help of these codes, the third coding cycle touched upon axial coding, meaning that the assigned codes are revised in terms of relevance, dominance, redundancy and, eventually, regrouped in terms of classifying codes among categories and subcategories (Saldaña, 2013; Van Thiel, 2015).

5.5 Reliability and validity

It is important to reflect upon the overall methodological approach and the strengths and weaknesses inherent to qualitative research and case studies in particular. Measurements need to be valid, i.e. they need to adequately reflect theoretical concepts, and be reliable. Replicated measurements should yield similar values of the indicators (Gschwend & Schimmelfennig, 2007). And, in addition to these concerns, the case study needed to strike a balance between providing a detailed account of

observations to unravel the causal patterns at stake while also lending itself to general inferences (Van Thiel, 2015). Often, however, a trade-off exists between these objectives. For instance, case studies excel in unravelling causal mechanisms at the cost of making valid general inferences. To tackle these concerns, the reliability and validity of the thesis are delineated within the following subsections to explain the ways this thesis has aimed to ensure them.

5.5.1 Validity

To guarantee the quality of scientific research, research needs to be *internally* and *externally valid*. *Internal validity* questions whether the measurements are an adequate reflection of what the researcher aims to measure. It relates to the question of whether the researcher has succeeded to measure the effect that he or she intended to measure. It touches upon the translation of theory objectives in empirical data in terms of the operationalisation of variables and the theoretical relationship between the independent and dependent variables (King et al, 1994; Van Thiel, 2015). This can only be done by means of providing a crystal-clear account of the operationalisations based on the theoretical construct. This means that construct validity should be guaranteed. To this end, several steps have been taken. First, two exploratory interviews have been conducted. And, with the help of these insights as well as discussions with the supervisor, the operationalisation and interview guide has been refined to guarantee that theoretically founded concepts are measured. Furthermore, the participant observations provided additional insights into the dynamics of the Civic Integration Act and its context. These insights helped to formulate follow-up questions within the semi-structured interviews (Dewalt & Dewalt, 2002).

In contrast, *external validity* refers to the generalisability of the conducted research, i.e. the extent to which valid general inferences can be made. The set-up of case study research, however, does not lend itself to generalising findings. This means that the external validity of case studies is low as case studies' findings tend to be context-bound (Bennet, 2022; Gerring, 2004; Van Thiel, 2015; Thomas, 2010). Nonetheless, case studies can still provide a basis for general inferences. Case studies can produce “contingent generalisations” that apply to subsets of a population that share combinations of independent variables” (Bennet, 2022, p. 66). This means that case studies can produce middle-range theories “about how similar combinations of variables lead to similar outcomes through similar processes or pathways” (Bennet, 2022, p. 66). Thus, even though the findings of case studies cannot be generalised directly, case studies can help to identify patterns (Bennett, 2022; Bleijenbergh, 2013; Widner et al., 2022). By studying policy enactment with the help of multiple observations, this thesis aims to live up to this expectation of identifying general patterns within street-level bureaucrats' policy enactment.

5.5.2 Reliability

In light of the external validity issues of qualitative research and case studies, it is important to reflect upon the reliability of this thesis. Reliability refers to the “accuracy and consistency” of measured variables within conducted research. Accuracy relates to the data collection methods and the question of to what extent they accurately measure variables and distinguish between different values within these measured indicators. Within this research, accuracy relates to the question of whether document analysis, semi-structured interviews, and participant observations are accurate data collection methods to measure, for instance, policy enactment (Van Thiel, 2015, p. 60). In contrast, consistency relates to the replicability of the conducted research. Will replicating this research produce the same results? This will increase the reliability of the research as it confirms the findings of a scientific inquiry. Yet within the field of public administration, the units of observation are often individuals who can either act rational or irrational, and can also learn from previous experiences. This means that the replicability of research with the same participants will not automatically produce similar results (Van Thiel, 2015).

Measures were, however, taken to enhance the reliability of this case study. First, the number of observations has been increased by interviewing fourteen civic integration consultants from different municipalities. The advantage of including these observations is the fact that more information became available (Swanborn, 2010). Second, the research design and process have been discussed with the supervisor to avoid measurement errors which are the product of inexperience, human error, and prejudice (Van Thiel, 2015). And, accordingly, it is presumed that research has been conducted in an accurate and consistent manner, meaning that findings are presumed to be systemic for as far this can be guaranteed within social science research,

5.5.3 Triangulation

One of the most prominent issues inherent to case studies is the fact that such studies are based on a few units of analysis. This makes it questionable whether findings can be valid and reliable. To solve this problem, this thesis resorted to triangulation. Triangulation can be defined as the collection and processing of data in at least three ways.¹⁰ This can, for instance, be done by relying upon different data collection methods to study the same phenomenon (methodological triangulation), using the same research method for different data sets (data triangulation), and letting research be conducted by

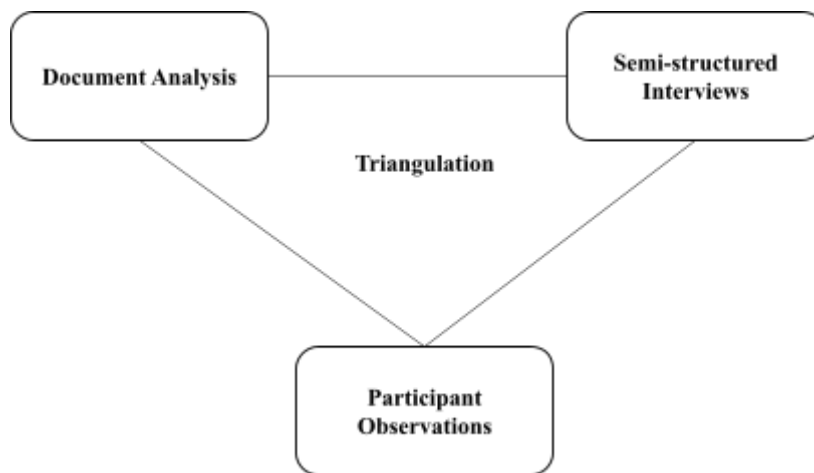
¹⁰ “By using a third measurement, any errors of the first two can be detected and, more in general, the accuracy of the first two measurements can be calculated. Hence, the more measurements that are being taken the more accurate will be the final calculation” (Oppermann, 2000, p. 144).

multiple researchers (investigator triangulation), or a combination of these approaches (multiple triangulation) (Oppermann, 2000; Van Thiel, 2015).

In this case, the thesis aimed to enhance the reliability and validity of its findings by means of methodological triangulation. As Figure 2 demonstrates, a combination of three different data collection methodologies have been employed and analysed in the same manner. Accordingly, findings are corroborated across datasets and the impact of biases that are inherent to case study research is reduced. This enhances the validity and reliability of this thesis significantly (Bowen, 2009; Oppermann, 2000).

Figure 2

Methodological Triangulation



Note. Own compilation to explain methodological triangulation. The figure is based on information from *Triangulation - a methodological discussion*, by M. Oppermann, 2000 ([https://doi-org.ru.idm.oclc.org/10.1002/\(SICI\)1522-1970\(200003/04\)2:2<141::AID-JTR217>3.0.CO;2-Uopen_in_newISSN](https://doi-org.ru.idm.oclc.org/10.1002/(SICI)1522-1970(200003/04)2:2<141::AID-JTR217>3.0.CO;2-Uopen_in_newISSN)). Copyright 2000 by M. Oppermann.

6. Results

This chapter engages with the empirical results of this thesis. To this end, the first subsection concentrates on the dependent variable by analysing civic integration consultants' policy enactment, i.e. their *policy interpretations* and *translations*. Subsequently, the second part of this chapter engages with these analytical dimensions by considering the influence of institutional factors first, before concentrating on the effects of actor-centred factors on civic integration consultants' policy enactment.

6.1 Policy enactment: policy interpretations & translations

This subchapter concentrates on civic integration consultants' overall policy enactment by considering their *policy interpretations* and *translations*. Attention is first paid to civic integration consultants' policy interpretations, hereby it is argued that a differentiation can be made between civic integration consultants policy interpretations by either classifying them as broad or narrow. This differentiation helps to shed light on the dynamics of civic integration consultants' policy interpretations as tensions between civic integration consultants' policy interpretations are observed. Subsequently, attention is paid to civic integration consultants' policy translations in terms of their perceived discretionary and customary practices. It is demonstrated that there is a direct interplay between civic integration consultants' policy interpretations and translations as civic integration consultants policy interpretations also inform their discretionary and customary practices.

6.1.1 Policy interpretations

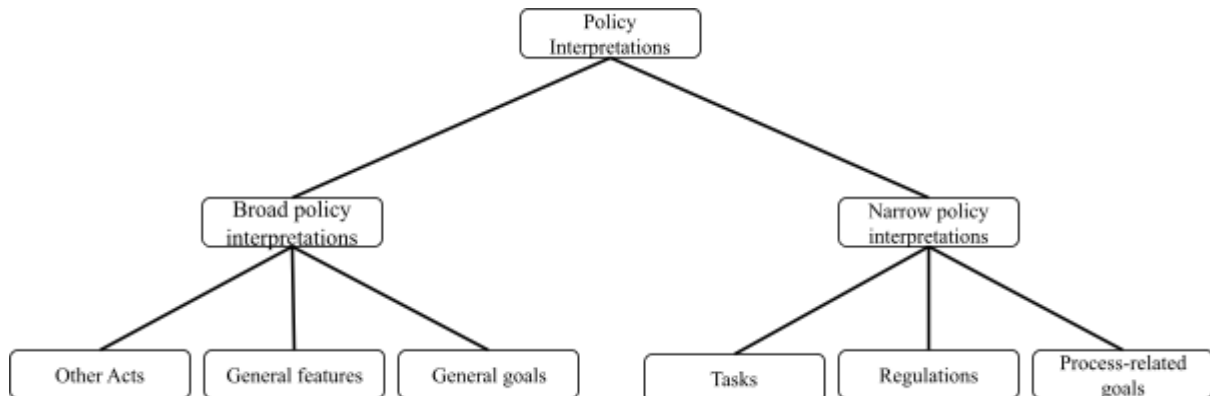
Policy interpretation concentrates on the way in which civic integration consultants describe the Civic Integration Act 2021 to assess which aspects civic integration consultants consider a priority. The collected data attests that civic integration consultants describe the act in different ways. They describe the act in reference to other acts, its general features, goals, their tasks and regulations. In light of these results, axial coding has produced two distinct categories: *broad* and *narrow policy interpretations* to classify these different descriptions, and gain deeper insights about civic integration consultants' policy interpretations.

Within Figure 3 an overview of this classification can be found. *Broad policy interpretations* are general features of the Civic Integration Act. These aspects are more generally oriented as they do not dictate a specific course of conduct. *Narrow policy interpretations* either directly or indirectly relate to civic integration consultants' own tasks (Ball et al., 2012). This differentiation sheds light on civic integration consultants' policy interpretations. It demonstrates that general features, general goals or other acts, can also become a priority. Civic integration consultants do not exclusively focus on

aspects which exclusively relate to their jobs such as their tasks, regulations which they need to take into account to their job, or process-related goals. Instead, a total of ten respondents were considered to predominantly have broad policy interpretations. Two respondents endorsed narrow policy interpretation, and two respondents mentioned an equal amount of broad and narrow features.

Figure 3

Policy interpretations



Source: Own compilation.

Regarding broad policy interpretations, almost all civic integration consultants describe the act in reference to other acts like the Participation Act (participant observation 1, 2; interview 1, 2, 3, 4), or previous Civic Integration Acts. In contrast, the new act is described as being facilitated by municipalities. General characteristics of the act that civic integration consultants often mention are its dual nature (language and employment), the MAP, PVT, procurement of languages and social counselling which are beyond the scope of respondents’ responsibilities. And, in relation to these features, civic integration consultants set broad goals like helping clients become “economically independent” (interview 14), “become self-reliant and participate within society” (interview 9), “that people can take care of themselves” (interview 7) etc.

Narrow interpretations refer to descriptions of the act in reference to civic integration consultants’ own tasks, process related goals, and regulations. For instance, one respondent maintains that the Civic Integration Act consists of “only four steps: 1) getting to know the client 2) the learnability test to assess the learnability of a newcomers 3) a broad intake to learn more about the personal situation and circumstances of the newcomers, and 4) the personal integration and participation plan (PIP) is drafted in which a newcomer’s civic integration trajectory is described” (interview 1), hereby the Civic Integration Act is conceptualised in relation to the respondent's own tasks and responsibilities. Furthermore, process-related goals can be endorsed such as “arranging everything as best as possible

for the client” (interview 5), “informing clients” (interview 1), “implementing the act as best as possible” (interview 3). Such descriptions often relate to regulations which need to be taken into account like the fact that the civic integration trajectory needs to be completed within three years (interview 13).

Thus, civic integration consultants describe the act by highlighting different features of the Civic Integration Act. Data demonstrates, however, that civic integration consultants’ policy interpretations can also clash with one another, making civic integration consultants muse on their policy interpretations. In that regard, three main observations are relevant. First, several examples can be identified in which civic integration consultants’ general goals interfere with specific regulations of the Civic Integration Act. For instance, many respondents stipulate that the Civic Integration Act 2021 aims to enhance *integration* and *participation*. Clients need to learn Dutch and participate through (unpaid) work, yet language courses are time-consuming preventing newcomers from working (interview 6, 14). “People, who need to complete their civic integration trajectory, cannot work full-time, especially if they integrate by means of the z-route” (interview 6). Another civic integration consultant expresses her struggle with the requirements for family migrants. Family migrants can choose their own language schools since they need to cover the costs of their own language lessons themselves. However, they can only choose from language schools with the certification mark “blik of werk”.¹¹ Are family migrants, [*who integrate via the self-sufficiency route*] but eventually pass the language exam at a CEFR level A2 or B1, required to attend language classes at such language schools? “If you are going to take the exams then it doesn't matter where you took those hours, right? So, should those hours still count with an A2 level exam? That's what it's all about, learning the Dutch language, isn't it?” (participant observation 2).

Second, a tension is observed between general features of the act and its rules and regulations. For instance, one respondent does not understand why working family migrants should complete the module labour market and participation (MAP) since they already have a job (interview 2). And, third, civic integration consultants’ tasks can clash with regulations. Some respondents argue that they struggle with clients who already have a job, but still need to complete 800 hours of participatory activities within the self-sufficiency route. In such cases, questions are raised about the regulations of the act vis-à-vis civic integration consultants’ tasks/responsibilities or broad policy goals. “Should I ask people to quit their jobs?” (participant observation 2). As one civic integration consultant ponders: “Do we want someone to work as quickly as possible, or do we want someone to acquire a high level of Dutch language proficiency? What takes precedence?” (interview 4). This suggests that broad and narrow policy interpretations are sometimes perceived to be incompatible, encouraging civic integration consultants to muse on their policy interpretations and translations.

¹¹ Blik op werk (n.d.) is an organisation which issues certification marks in reference to sustainable employment and participation.

6.1.2 Policy translations

Two indicators have been attributed to grasp civic integration consultants' policy translations: *perceived discretion* and *customisation*. Both indicators are considered as well as its interplay with civic integration consultants' policy interpretations. Findings demonstrate that civic integration consultants can do policy, i.e. exercise discretion and customisation in several ways, hereby some unity between civic integration consultants policy interpretations and translations is also observed. Civic integration consultants with broad policy interpretations also believe that they exercise more discretion and provide more customisation. It appears that their policy interpretations inform their policy translations.

Accordingly, this subsection considers civic integration consultants' discretionary practices first, before scrutinising the relation between civic integration consultants' discretion and policy interpretations. The second subsection analyses the degree to which civic integration consultants believe to provide customisation and, subsequently, elaborates on the relationship between customisation and civic integration consultants' policy interpretations.

Discretion

All interviewed civic integration consultants are responsible for the broad intake, determine the learning route, draft the PIP, and monitor the overall civic integration process of clients subjected to the Civic Integration Act 2021, yet their discretion varies. Nine respondents believe to exercise a high degree of discretion. They believe that they have a lot of freedom and can reach decisions independently (interview 2, 4, 5, 6, 7, 8, 9, 13, 14). "I can decide everything for myself" (interview 6), "as long as you do your job, and all other things you can decide everything for yourself (interview 8), I do everything independently, I don't have to ask anyone and no one checks what I am doing" (interview 14). Furthermore, these civic integration consultants proclaim that they can sanction clients. Some civic integration consultants impose sanctions through the Participation Act, meaning that social benefits of status holders are (partially) cut. Others can fine clients for their behaviour through the Civic Integration Act 2021. And, some argue that they resort to both options. "I have the authority to be mean to people. I may impose sanctions on clients or slap them with a fine" (interview 2). "We can go either way, either in the sense that the benefit is cut in half or a percentage is withheld, or we impose a fine based on the Integration Act" (interview 7).

In contrast, four respondents exercise discretionary powers to a medium degree. They argue that they can still reach decisions independently and believe to enjoy a lot of freedom, yet they assume that they have limited opportunity to sanction clients (interview 3, 10, 11, 12). Three respondents argue that they are in the dark about whether they can impose sanctions. The fact that no policy has been drafted yet, makes them insecure about whether they can sanction clients (interview 11 & 12).

Another civic integration consultant stipulates that this is not part and parcel of her tasks and responsibilities. She proclaims that she can only forward concerns about the behaviour of clients towards another public servant who can impose fines. “The fine civil servant (*boete ambtenaar*) decides on the fine” (interview 3).

And, finally, one respondent insists that he has little opportunity to exercise discretion (interview 1). “I do not hold any power” (interview 1). This conception is permeated within the civic integration consultant’s understanding of his tasks and responsibilities. Upon being asked whether he can go against the test results of the learnability test he answers in the affirmative, yet he stresses that it is never his decision to make. He highlights that this is done in agreement with clients. “I can explain why I consider one route more suitable than another, but I cannot impose anything” (interview 1). The client makes the decision, whereas the respondent contains that it is his job to inform clients so that they can make informed decisions (interview 1). Only in two specific cases does this integration consultant indicate that he can reach decisions. First, the civic integration consultant believes that he needs to act in case of misbehaviour. And, second, the civic integration consultant declares that he can decide *when* clients will start their civic integration trajectory, yet he tries to leave it up to his clients as he believes that “the motivation should also come from within yourself and not from the municipality” (interview 1).

Discretion & policy interpretation

Within this subsection attention is paid to the interplay between civic integration consultants’ policy interpretations and discretion since most civic integration consultants with broad policy interpretations also enjoy extensive discretionary powers. In contrast, a low level of discretion also relates to a narrow policy interpretation. An overview of these results can be found in the table below.

Table 9

Policy interpretation/discretion

	Low Discretion	Medium Discretion	High Discretion
Narrow Policy Interpretation	1		
Medium Policy Interpretation			2
Broad Policy Interpretation		4	7

N = 14

Three empirical patterns are important. First, within one interview, it becomes apparent that a civic integration consultant's high levels of discretionary powers are intertwined with her broad policy interpretations. The respondent indicates that she can sanction newcomers through the Participation Act which means that she can cut the benefits of status holders. At the same time, however, she also conceptualises the Civic Integration Act in line with the Participation Act by describing the act as follows: “We stick to what the Participation Act says about it, because we really see it as a reintegration route and aim to treat all benefit recipients equally” (interview 6).

Second, empirical observations suggest that civic integration consultants' broad policy interpretations inform their discretion. First, civic integration consultants refer to the act to justify their discretion (interview 7, 9, 10). For instance, one respondent relies upon a metaphor to describe his discretionary powers. The Civic Integration Act is compared to a highway. “On both sides of the road you are constrained by the act, but between those lines you can do as you please” (interview 9). Furthermore, policy interpretations can inform respondents' discretion regarding sanctions. One respondent, who has a medium policy interpretation, reveals that she pleaded to also be authorised to sanction clients. “That was not arranged at the beginning either, but we asked for it. Because it [*imposing sanctioning*] is not done under the Participation Act. It's really in the context of integration. And, yes, then we have to do it as well. We also draft the PIP and invite them [*clients*] and it's with us, would they not comply with it. So then we also have to impose the fine” (interview 5). Another female civic integration consultant, who endorses a broad policy interpretation, upholds a similar logic by saying that she is not sure whether she is authorised to sanction newcomers, yet she reasons that it is mentioned within the PIP which leads her to believe that she is probably authorised to do so (interview 11).

And, lastly, most civic integration consultants, who are authorised to sanction clients, repudiate sanctioning for different reasons (interview 2, 6, 8, 9, 13). First, some civic integration consultants cast doubt on its efficacy. “It will not serve its purpose, namely behavioural change in the sense that someone will comply, provide information” (interview 6). “I don't know whether it would help. I personally think that you will be better off with a good conversation (interview 8). “We will not do that [*impose fines*]. I am determined not to do that when enforcing the Civic Integration Act. After all, where there is misery, there is nothing to gain anyway” (interview 2). Another respondent asserts that sanctioning is a time-consuming process for the civic integration consultant and won't make a difference. “A client won't be affected by a fine of 25 euros” (interview 13).

Customisation

The second indicator of policy translation is customisation. The degree to which civic integration consultants provide customisation varies. Four civic integration consultants believe to provide a high degree of customisation (interview 6, 9, 10, 12). They have long or multiple conversations with clients

(interview 6) and see them frequently (interview 12). One civic integration consultant argues that she provides customisation by cooperating with Vluchtelingenwerk, a charity organisation focused on refugees. The civic integration consultant sometimes works at their location so that her clients see her often. According to the civic integration consultant, it contributes to seeing the municipality in a more positive light as clients tend to associate municipalities with rules and regulations (interview 12). Furthermore, these civic integration consultants maintain that they provide additional services which sometimes can go against civic integration consultants' tasks and responsibilities and regulations. Most of them aim to find appropriate "participation places" (*participatieplekken*)¹² based upon the interests of clients (interview 6, 9, 10). One civic integration consultant claims to look for ways to accommodate the aspirations of clients even when this conflict with the rules and regulations of the Civic Integration Act, e.g. participation places or education is attended within an English speaking environment instead of a Dutch setting (interview 9). Other examples are delaying the PIP (interview 6), signing family migrants (who should arrange their own language courses) up for the same language schools as status holders (interview 12) and launching projects and groups for clients (interview 9, 12). One civic integration consultant has launched a women's group in which different topics are discussed like education, public health service (GGD), etc. "And, out of that group, I started a language group also with the men" (interview 12).

Seven civic integration consultants provide a medium degree of customisation (interview 1, 2, 3, 4, 8, 11, 13). They believe to provide customisation by working in a cultural sensitive manner (interview 11, 13), scheduling more appointments with clients (interview 11), scheduling appointments at the convenience of clients (interview 13), delaying the PIP (interview 2, 3, 13), paying more attention to some clients like illiterates or low skilled clients (interview 1, 2), overstepping their own task and obligations (interview 1). Sometimes special arrangements are made (interview 10). For highly educated clients other arrangements have to be made in terms of finding appropriate employment. Examples are "for a heart surgeon we have to see whether he can start working as a surgeon once again" (interview 8), combining a B1 route trajectory with secondary vocational education for some clients (interview 3), arranging a different language school for some clients (interview 4), or arranging a temporary different language schools for clients who cannot start with the educational pathway yet (interview 4).

In contrast, three civic integration consultants believe that they provide little customisation (interview 5, 7, 14). Two proclaim that they have little opportunity to do so (interview 5, 14). One civic integration consultant argues that housing shortage, a shortage of teachers, and regulatory constraints like the fact that clients are not allowed to take online language lessons prevent her from providing customisation (interview 5), especially because customisation is further limited by financial restraints (document 4). Another civic integration consultant maintains that she cannot provide

¹² Participation places are temporary work places for welfare recipients who experience difficulties in securing employment (Sociale Zaken Maastricht Heuvelland, n.d.).

customisation as clients are not allowed to attend language schools which might better accommodate their needs, nor take online language lessons. The only way in which she thinks that she can provide customisation is by allowing some clients to already start their civic integration trajectory at the asylum seeker’s centre. Nonetheless, this is only possible if the client lives nearby (interview 14). Furthermore, another civic integration consultant exclusively conceptualises customisation in reference to her tasks and the set-up of the act. Through the learnability test and the broad intake one gets to know the client so that an adequate learning route can be chosen. By doing so, the civic integration consultant believes to provide customisation (interview 7).

Policy interpretation and customisation

Within this subsection, attention is paid to the linkage between civic integration consultants’ perceived level of customisation and policy interpretations. The table below indicates that most civic integration consultants believe to provide customisation to a medium or high degree. There are two civic integration consultants who have broad policy interpretations, yet provide little customisation. Considering these results, three empirical patterns are relevant.

Table 7

Policy Interpretation/Customisation

	Low Customisation	Medium Customisation	High Customisation
Narrow Policy Interpretation		1	
Medium Policy Interpretation	1*	1	
Broad Policy Interpretation	2*	6	3*

N = 14

** These respondents do have high levels of discretionary powers*

First, limited options to provide customisation can influence civic integration consultants’ policy interpretations. One respondent, who stresses having no possibility to provide customisation, also warns about the implications of customisation. “You just can't do it randomly, you also have to follow a certain line of reasoning. Are you providing customisation? Or are you now creating case law for something that is not intended at all?” (interview 5).

Second, some civic integration consultants rely upon general goals to justify conduct. For instance, one respondent proclaims she notices that the three different learning routes fail to

accommodate clients' aspirations. Clients need to meet the requirements of the Civic Integration Act, yet this does not always suit the purported goal of finding clients' sustainable work. In such cases, the respondent claims that she aims to help clients while also taking the supposed goals of the act, i.e. getting people to work and learning the language, into account (interview 9 & 10). "If people already have a plan, can work, are busy in the terms of study or work or something, then something else has to be arranged for them" (interview 10). Another civic integration consultant endorses a similar logic by stating that she provides customisation in relation to the ultimate goal of the act: "Every time when I have a conversation with a client I try to remind myself of the ultimate goal of the act. And the goal is to integrate" (interview 3). Furthermore, another respondent also argues that one of the main incentives for the provision of customisation is sustainable employment. Highly educated people should not do low skilled work as this would not lead to sustainable work which she considers to be the goal of the act (interview 8).

Third, customisation can clash with general features or regulations of the act. "We give it our best and try to be as service-orientated as possible but sometimes you just get stuck because you yourself are dependent on other parties and legislation and rules and well all sorts of restrictions" (interview 4). Moreover, civic integration consultants' policy interpretations can clash with the purpose(s) of the learnability test. For instance, one respondent reasons that the learning routes are a means to provide customisation. Most clients ought to integrate via the B1 learning route, meaning that they have to acquire a B1 level of language proficiency within three years. However, the results of the learnability test often indicate that clients are incapable of doing so. This makes some civic integration consultants also doubt the use of the learnability test and whether it is an adequate tool to provide customisation (interview 4, 5).

6.2 Understanding the dynamics of policy enactment

Within this section attention is paid to the influence of institutional and actor-centred factors on civic integration consultants' policy enactment, i.e. policy interpretations and/or policy translations. To this end, the influence of institutional factors is scrutinised first, before the second subsection the impact of actor-centred factors on civic integration consultants' policy enactment.

6.2.1 Institutional factors

This subsection concentrates on the influence of institutional factors on civic integration consultants' policy enactment. Findings suggest that institutional and actor-centred factors can influence civic integration consultants policy enactment in different manners. In reference to the institutional factors, the work setting predominantly influences civic integration consultants' policy interpretations,

whereas informal rules can influence civic integration consultants' overall policy enactment, i.e. policy interpretations and translations. To demonstrate this point, the influence of the work setting is delineated first, before describing the impact of informal rules on civic integration consultants' policy enactment.

Work setting

Within this section attention is paid to the influence of the work setting on civic integration consultants' policy enactment. To assess this influence, two indicators were selected: *case/street level bureaucrat ratio* and the notion of *demands meets supply*. Both indicators influence civic integration consultants' policy enactment. High caseloads are perceived as problematic in reference to the tasks which need to be completed by civic integration consultants, i.e. policy interpretations, and, thereby, influence their policy translations. In contrast, mixed responses are observed regarding the notion of *demand meets supply*. Some civic integration consultants maintain that hiring practices will have a positive influence on their services whereas others believe that hiring additional staff won't affect their policy enactment.

Considering these observations it is important to examine respondents' caseload sizes, before attention can be paid to the influence of the caseload size and the notion of demand meets supply. The table below displays civic integration consultants' caseload sizes apropos their policy interpretations and translations..

Table 8*Respondents' caseload size*

Caseload	Municipality	Policy Interpretation	Discretion	Customisation
72	Large municipality	Narrow	Low	Medium
11*	Small municipality	Medium	High	Medium
50	Medium-sized municipality	Broad	Medium	Medium
50	Medium-sized municipality	Broad	High	Medium
50	Medium-sized municipality	Medium	High	Low
Not specified	Medium-sized municipality	Broad	High	High
75	Medium-sized municipality	Broad	High	Low
80	Medium-sized municipality	Broad	High	Medium
80	Medium-sized Municipality	Broad	High	High
13	Medium-sized municipality	Broad	Medium	High
70	Large municipality	Broad	Medium	Medium
40	Small municipality	Broad	Medium	High
56	Large municipality	Broad	High	Medium
87	Large municipality	Broad	High	Low

N = 14

The table demonstrates that civic integration consultants with extensive caseloads still score high on policy translation and have broad policy interpretations whilst others, with fewer clients, believe to provide little customisation or uphold narrow policy interpretations. Also, upon being asked about the influence of the caseload size on their services, two respondents stipulate that they are unaffected by

their caseload size (interview 1, 8). “Still, I don’t experience pressure because I am always on good terms with my clients. I enjoy helping them. And, thus the influence of the caseload is a positive one” (interview 1).

In contrast, eight civic integration consultants proclaim that their caseload size influences their services as they have less time at their disposal for decision-making and providing customisation (interview 2, 3, 7, 9, 11, 12, 13, 14). For instance, a civic integration consultant with 72 clients proclaims that she is occupied. “So yeah, that [*the amount of clients*] has a lot of influence, because you have less time at your disposal. People have to wait longer for appointments, or you can not address problems as quickly as usual. That’s not the way we want to work” (interview 11). Another respondent, who has 87 clients, declares that her caseload size puts her under a lot of pressure, preventing her to draft the PIP within ten weeks, and to have in-depth conversations with clients. “Sometimes I am so stressed that I forget to do my tasks. I will write that down now. Or run out of time to report because I no longer have the data. Then you have to invite or call someone again” (interview 14).

Furthermore, other factors may matter more than the caseload size. First, some civic integration consultants argue that the composition of the caseload matters (interview 3, 13). “In the past, my caseload has been much higher. Yes, about 70-80 people, and back then I was sometimes much more quiet than now” (interview 13). Second, the frequency and intensity of influx matters to some civic integration consultants since clients are under intense supervision within the first six months (interview 1, 12, 13). “In my opinion, it’s all about the frequency of the influx. It can happen that I suddenly have a family of five adults in my caseload. Then I have five PIP interviews, five broad intakes, and five learnability tests. That’s a very different intensity than if you get five people over so many weeks while at the end of the line you have an equally high caseload” (interview 13). Third, other responsibilities can deprive civic integration consultants of their time. For instance, a civic integration consultant stipulates that she also has other responsibilities and many colleagues also ask her for advice or information (interview 2).

Thus civic integration consultants reflect upon their caseloads differently. One has to bear in mind, however, that the caseload size of respondents is likely to increase over time since clients have three years to complete their civic integration. This means that most civic integration consultants will keep their clients while new clients will become assigned over time as well. Accordingly, some civic integration consultants claim that they are busy hiring new staff. And, considering these hiring practices, civic integration consultants have different expectations about how this will affect their services. Two civic integration consultants believe that additional staff will not help to reduce their caseload size (interview 1, 14). Three civic integration consultants believe that hiring practices would exclusively reduce their caseloads size. “I think that it [*hiring someone*] would solely be about the caseload as we [*the civic integration consultants*] already have so much experience” (interview 5).

Other civic integration consultants believe that hiring practices will have a positive effect on their services. One civic integration expects to offer more quality by “paying more attention to the problems of clients, holding conversations, building up a relationship with clients, investing more time in better cooperation with network partners” (interview 11). Another respondent, who recently got a new colleague, argues that he is already having more time. And, he believes that eventually he will also be able to take up other tasks, frequent Divosa meetings, launch a project for women, or make home visits (interview 9). Furthermore, within one municipality there is the intention of hiring an administrative assistant to take over specific tasks of the three interviewed civic integration consultants (interview 7, 8). According to the respondents, this will have a positive influence on their services as they will have more time at her disposal to guide, coordinate and monitor clients (interview 7). “This would provide me with the opportunity to take on more clients and to engage within in-depth interviews. Holding interviews about clients’ progress so that we can work on your PIP [*clients’ PIPs*] and prospects” (interview 8).

Informal rules

Within this section, attention is paid to the extent to which ambiguous and/or conflicting goals and expectations can influence civic integration consultants policy enactment, i.e. policy interpretations and translations. For this purpose, attention is first paid to the different expectations which managers and colleagues may have from civic integration consultants, before assessing their influence on civic integration consultants’ policy enactment.

Civic integration consultants mention that superiors and colleagues can endorse different goals and expectations. Superiors can expect civic integration consultants to “do their job” (interview 3, 7, 8, 12, 13, 14,), be culturally sensitive towards clients (document 2), account for their actions (interview 13), inform them about problems (interview 3, 7, 14), “start the civic integration trajectory on time” (document 4), work towards set targets (interview 1, 7), report well (interview 11, 12), draft the PIP within ten weeks (interview 11, document 2), do not more than is required (interview 11), etc., while colleagues can expect civic integration consultants to be able to take over their tasks (interview 7), keep paperwork up-to-date (interview 2, 12), consult them in case of difficulties (interview 12), cooperate (interview 2, 11), pay attention to their clients (interview 8), or do something extra for a client if necessary (interview 8), etc.

Most respondents, however, declare that they do not perceive these goals and expectations as problematic. Rather, they stipulate that they are oblivious of the goals and expectations of supervisors, even though a wide variety of goals are formulated in reference to the act which are often conflicting or ambiguous (interview 4, 5, 10; document 3, 4). The document analysis illustrates that civic integration consultants are expected to start with the civic integration trajectory as quickly as possible, provide customisation, ensure that clients participate and integrate through the acquisition of language

proficiency and employment while offering quality to clients (document 6). Other respondents argue that superiors do not have expectations from them (interview 8, 13), that colleagues and superiors have similar expectations from them (interview 3, 6, 14), or that they are not bothered by these different expectations (interview 2, 7).

Thus, there is little evidence suggesting that ambiguous or contradictory expectations influence civic integration consultants' policy enactment. Only three civic integration consultants appear to hint at this possibility. First, one civic integration consultant emphasises that he is coping with different expectations. A plan is written about certain targets which have to be reached. The civic integration consultant maintains, however, that his manager is unaware of the amount of other tasks and obligations, preventing him from doing his job. "I don't think he or she is aware of the amount of hours and work that goes into a community of practice. How does that relate to the other expectations? Or, two hours for a test, or the amount of time GDPR meetings take" (interview 9).

Furthermore, two respondents do eventually mention some conflictory and ambiguous goals and expectations. One interviewee says that superiors have several contradictory and ambiguous expectations. A reduction of her caseload size should encourage her to pay more attention to clients, have more meetings with them, build up a relationship with them, and invest more time in cooperating with network partners, yet she also needs to keep the regulations of act, like drafting a PIP within ten weeks, into account and not take on tasks which are beyond her responsibility. "I am sometimes still a bit lost in the organisation, because you are of course obliged to enforce a law while you also want to provide input and customisation. And, sometimes that's still a puzzle" (interview 11). And, eventually the respondent sticks to regulations, a particular aspect of her policy interpretation which she also highlighted within her description of the act, at the cost of providing customisation. Another civic integration consultant argues that her manager expects her to make sure that "everything is financially covered", whereas she presumes that her colleagues expect her to get things done and help people forward (interview 2). This leads to frustrations as the civic integration consultant proclaims that the expectation of keeping systems up-to-date is given precedence over people. "If you are going to focus on the bureaucracy you will not reach the goals of the act as originally intended" (interview 2).

6.2.2 Actor-centred factors

There are several actor-centred factors which are presumed to influence street-level bureaucrats' policy enactment. Not only are capabilities deemed relevant, but also street-level bureaucrats' preferences and perceptions. Findings demonstrate that civic integration consultants' *capabilities*, *preferences*, and *perceptions* can influence civic integration consultants' policy enactment. Civic integration consultants' capabilities affect civic integration consultants' policy enactment, i.e. interpretations and translations, whereas civic integration consultants' preferences and perceptions

predominantly influence their policy translations. Accordingly, attention is first paid to the influence of civic integration consultants' capabilities on their policy enactment, before scrutinising the effects of civic integration consultants' preferences and perceptions on their policy enactment.

Capabilities

Scharpf (1997) and Lipsky (2010) stipulate that street-level bureaucrats' personal and action resources can influence their services. This thesis, however, relied on four indicators: *preparation*, *time*, *information*, and *experience*, to assess the influence of street-level bureaucrats' capabilities on their policy enactment. This subsection elaborates on the degree to which these indicators as well as their interplay affects civic integration consultants' policy enactment by elaborating on the influence of these indicators in turn.

Civic integration consultants argue that they were prepared for the new act in different kinds of ways. They received training (interview 1, 2, 4, 5, 7, 8, 9, 13, 14), attended meetings (interview 7, 13), run a pilot plan (interview 1, 4, 5, 8, 9), or were involved in the set-up of the act (interview 3, 13). Others did not receive any training (interview 6, 11, 12), prepared themselves through self-study (interview 2, 7, 11, 13) or were trained by colleagues (interview 10, 11). And, irrespective of these different preparations, five civic integration consultants proclaim that they were well-prepared, hereby one empirical observation is relevant. One civic integration consultant combined work with study, and ultimately wrote her thesis on the new Civic Integration Act. With the help of her thesis, she has developed a brochure for clients which is now used within this municipality to inform them about their integration trajectory (interview 7). In contrast, only one civic integration consultant highlights that she was ill-prepared for the amount of bureaucracy involved within the provision of the act. "On the whole, what I missed was again that bureaucracy. Preparation for it" (interview 2). The civic integration consultant argues that figuring out the systems prevented her from paying attention to her client and providing customisation. The civic integration consultant proclaims, for instance, that she wants the PIP to take effect on the very same day that clients will start attending school, yet the civic integration consultant did not know how to organise this within the systems (interview 2).

Thus most civic integration consultants received some form of training, and do not mention ways in which their (lack of) training influence their services. Rather, available time and information matter. Several respondents confess that they are lacking time to stay up-to-date about the latest developments (interview 11), do broad intakes earlier (at the asylum seeker centre) (interview 6), draft PIPs within ten weeks (interview 2, 3, 5, 12, 13, 14), work ahead in terms of checking in on clients, considering their prospects and "doing something" extra (interview 2), look up information (interview 2), and have private conversations with clients (interview 14). And, to some degree, this time shortage also relates to civic integration consultants' limited access to information. Even though civic integration

consultants rely upon sources like colleagues, superiors, databases, meetings etc., they still encounter problems in their quest for information. In that regard, three main observations are relevant.

First, civic integration consultants have limited access to clients' personal information due to privacy regulations. For instance, DUO dictates that clients have to be present when asking for personal information. This means that the civic integration consultants have to make an appointment with the client to access such information (interview 11). Second, respondents have difficulty accessing information because of gaps within policies. "I notice that we still do not know everything about the act. You have your caseload and are still busy trying to figure things out" (interview 11) as available information is insufficient regarding specific cases (interview 13; participant observation 2). For instance, one civic integration consultant mentions that she has a client, a family migrant, who is staying with his/her child and is also on social benefits. How do you let someone like that pay for language classes? Should he or she borrow money? And what do you do with the participatory activities? Or, do you simply not do that? I can't find any information about that" (interview 5). Other civic integration consultants are in the dark about whether they can impose sanctions since no policy has been drafted yet (interview 11, 12). "I have to figure that out together with a policy maker, because it is new material" (interview 12). Third, information can be contradictory like information provided by different employees working for DUO (interview 11). And, finally, civic integration consultants do not always get required information from network partners, such reports' from COA (interview 14), which means that cooperation stagnates (interview 13).

However, to some degree a shortage of time and information also relate to civic integration consultants' own perceptions. In particular, most of the civic integration consultants, who argue that they are unable to draft a PIP within ten weeks, cannot meet this deadline as they want to "figure out what is possible for clients" (interview 3), or get to know clients so that the content of the PIP also makes sense and is not a legal formality (interview 4, 5). This signifies that acquiring information can be a time-consuming undertaking. And, given these constraints, some civic integration consultants argue that they simply make decisions or arrange things within the absence of information or policy (interview 3, 5, 9, 10). "Sometimes there is no information available and in such cases you have to come up with something yourself until policy is drafted" (interview 5). As one civic integration consultant reasons: "I could not find that information [*altering the PIP once within the first 1,5 years*] so I am not worried about that. And I think, eventually we decide how it will be and we always act within the interests of clients to help them forward. If you can explain what you do and why, you will always get away with it" (interview 3).

Consequently, several civic integration consultants stipulate that they rely upon their experience to do their jobs (interview 6, 9, 10, 12, 13, 14). "It is also about experience" (interview 13). "It's really about very specific cases and I think that experience is then more important than it being described in

the law” (interview 14). Civic integration consultants draw, however, on different experiences like previous job, personal and educational experience, hereby three main observations are relevant.

First, civic integration consultants’ experience can influence their policy interpretations. For instance, a civic integration consultant, whose parents came over to the Netherlands as guest workers, highlights the importance of combining language acquisition with participation, i.e. the duality of the Civic Integration Act. “I believe even more in the power of, or at least as much, connecting with people at the workplace” (interview 3). Moreover, civic integration consultants, who have experience sanctioning, predominantly proclaim that this is an inefficient method to stimulate behavioural change (interview 10, 13). “Very often it just didn't yield anything [...] Rather, it drives them away” (interview 10). Accordingly, many civic integration consultants also proclaim that they rather engage in conversations with clients than impose sanctions (interview 9, 10, 13), and thereby re-evaluate their tasks, i.e. policy interpretations.

Second, experience can influence civic integration consultants’ policy translations. For instance, one civic integration consultant, who sees limited opportunity to provide customisation, stipulates that over twenty years of service, she has never been able to provide customisation (interview 5). The respondent has become disillusioned regarding the provision of customisation, even though another respondent from the same municipality still finds ways to provide customisation (interview 4, 5). In contrast, another civic integration consultant says that the Civic Integration Act dictates that she should see her clients every three months. However, this is not “her way of working as she has worked at Vluchtelingenwerk” (interview 12) and has found different ways like collaborating with Vluchtelingenwerk and launching different groups so that she sees clients often (interview 12). Furthermore, several civic integration consultants argue that they base decisions on experience (interview 3, 8, 9). “But as a consultant, we see people doing their civic integration trajectory for so long and we have experience with it. Then at some point you can make a reasonable decision” (interview 3). Or, it helps them to decide to what extent clients require attention from the civic integration consultant (interview 1). And, moreover, personal experience can influence civic integration consultants’ policy translations as they tend to be aware of differences in cultures and resort to cultural sensitive skills which can help to make clients feel more comfortable (interview 1, 3, 7).

Perceptions

Lipsky’s (2010) theorises that street-level bureaucrats resort to practices of routines to maximise the utility of available resources. Accordingly, this thesis aimed to unravel to what extent civic integration consultants resort to routines. Three main observations are relevant in that regard. First, only two civic integration consultants argue that they have fixed routines. One civic integration consultant stipulates that she predominantly relies upon lists and schedules to manage her caseload size (interview 8). The

other respondent states that she has a weekly routine by working every day at different locations like the city hall, a location of Vluchtelingenwerk, etc. which also signifies that certain tasks are carried out on specific days and within a specific manner. The respondent follows a standard procedure for processing clients. First, an introductory interview is scheduled to inform clients about the Civic Integration Act 2021, and, subsequently the learnability test and PIP are finalised so that clients can attend school as quickly as possible. This ultimately translates into standardised procedures of assigning clients to certain learning routes. Clients under the age of twentyseven are assigned to the B1 or learning route, irrespective of whether they would fit better within the self-sufficiency pathway (interview 12).

Second, other civic integration consultants mention that they have some form of a weekly routine by planning appointments with clients on Mondays and Wednesdays, and scheduling meetings on Tuesdays and Thursdays (interview 11), doing most administrative work on Fridays (interview 2, 13), scheduling learnability tests on Fridays (interview 9), or form of a routine in the way they do their work like planning appointment with clients one week in advance (interview 1), letting most clients simply integrate via the B1 route irrespective of the results of the learnability test (participant observation 2), and scheduling new appointments right after an appointment (interview 7, 13). Furthermore, another civic integration consultant proclaims that she mostly has a routine regarding the broad intake so that the civic integration consultant can make sure that PIPs are drafted within the ten weeks (interview 7).

Third, most interviewees postulate that they do not have strict routines or do not rely upon routines for several reasons. First, two civic integration consultants argue that they do not rely upon routines since they are chaotic (interview 3, 4). Second, four respondents declare that the chaotic work setting prevents them from incorporating routines (interview 2, 4, 5, 14). For instance, one interviewee argues that clients are at different stages, meaning that different services need to be provided (interview 4). Two other respondents stress that they are constantly interrupted by questions or tasks which need to be addressed straightway (interview 2, 5). Third, inclinations to accommodate clients can intervene with routines. For instance, one respondent adjusts her schedule to the convenience of clients or network partners (interview 14), whereas another civic integration consultant proclaims that he finds it very important to be on good terms with clients (interview 1). “We are going to be together for three years. So, it is important that we have a good relationship”, and, accordingly, the civic integration consultant reasons that during appointments he will not fill in data simultaneously, but rather listen to his clients (interview 1). Furthermore, one respondent used to resort to a standard questionnaire to guide her through appointments with clients, the respondent remarked that some standard questions were part and parcel of the broad intake. However, over time, the respondent stated that she no longer used this protocol as she looks per person “what works” (interview 11). And, fourth, personal convictions can one respondent also warns about the impact of

routines by stating that routines can also make you small-minded. And, in such cases, the civic integration consultant also believes that you do clients wrong (interview 2).

Preferences

It has been theorised that street-level bureaucrats' preferences can influence their policy enactment. To assess this influence, this thesis focused on two distinct indicators: *prioritisation* and *creaming*. These indicators are considered in turn since respondents can prioritise between clients differently. Attention is first paid to prioritisation between clients, before considering creaming practices.

Data attests to different ways of prioritising between clients. Some civic integration consultants prioritise based on notions of consequences (interview 3, 7, 14), urgency (interview 13), problems (interview 3, 11) clients' needs (interview 1 & 13) or deadlines (interview 13), whereas others are encouraged to prioritise between specific groups of clients like new clients or female clients or young mothers (document 1, 3, 4), and/or, accordingly, prioritise between specific groups of clients (interview 1, 6, 9, 10, 14). In that regard, two main observations are relevant. First, two civic integration consultants, with extensive caseload sizes, predominantly focus on "new clients", i.e. clients who fall under the jurisdiction of the new Civic Integration Act, at the costs of other clients (interview 9, 14). "I am basically not doing anything for the old act. I am not going to ask anything about how their integration is progressing" (interview 14). Another civic integration consultant says something similar by arguing that the PIP and registration with language schools, i.e. tasks which need to be fulfilled within the first six months of new clients' civic integration process, have priority (interview 6).

Second, one civic integration consultant, with a narrow policy interpretation, argues that he predominantly utilises simplifications to prioritise between his 70 clients and provide customisation. He conceives of his clients as his children and, depending upon their perceived age as babies, toddlers or small children, they are given more or less attention. Illiterates are compared to newborn infants while highly educated clients are considered to be small children. The civic integration consultant predominantly focuses on low skilled or uneducated clients (who have recently started their civic integration trajectory) at the costs of highly educated clients or oldcomers (*oudkomers*) as they are perceived to be more self-dependent. This means that of those 70 clients, the civic integration consultant is predominantly preoccupied with the approximately twenty new clients (interview 1, document 1).

These findings seem to suggest that most respondents prioritise between clients alongside different notions, yet some civic integration consultants also engage in creaming. For instance, one respondent argues that she does not have enough time to carry out tasks due to the size of her caseload. As a

result, she proclaims that she shuns “difficult” clients, i.e. unwilling or unmotivated clients, in favour of other clients, or solely engages with them in a formal or strict manner (interview 2). “You are going to focus on willing clients” (interview 2). A similar logic is observed within interview 14 in which the respondent mentions that she can provide customisation by letting some clients start their civic integration trajectory already at the asylum seeker centre. Hereby, the respondent declares that she takes clients’ motivation into account. If the client does not appear to be motivated, the respondent reasons that she will let them start their civic integration trajectory. “If someone is motivated and shows initiative and is really motivated, then I will do it, but not if someone is simply bored [*in an asylum seeker centre*]” (interview 14). Thus, prioritisation and customisation are mostly triggered by extensive caseloads. Thus, findings within this chapter attest to the influence of institutional actor-centred factors on civic integration consultants’ policy interpretations. And, considering these findings, the subsequent section will interpret these findings and discuss them in reference to theoretical framework and literature review.

7. Discussion

Within this section, the aforementioned results are discussed and interpreted in reference to the theoretical framework and existing literature review. Accordingly, civic integration consultants' policy enactment are discussed first, and, subsequently, the influence of the analytical dimensions of institutional and actor-centred factors on civic integration consultants' policy enactment. And, within the final section, the findings' implications and limitations are considered.

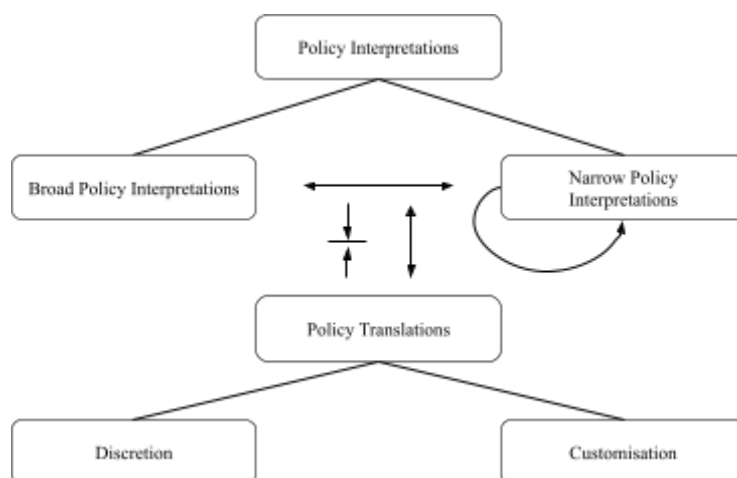
7.1 Street-level bureaucrats' policy enactment

Considering the presented findings, there is much food for thought. Many civic integration consultants were considered to have broad policy interpretations, meaning that the Civic Integration Act is mostly described in reference to general goals, general features of the act, or other acts, hereby findings demonstrate that policy interpretations can also conflict with each other. First of all, civic integration consultants' broad policy interpretations can sit uneasily with their narrow policy interpretations. The results demonstrate that broad policy interpretations like the general goals and features can clash with regulations. The general goal of finding employment, for example, runs counter to the regulations of attending intense and time-consuming language courses. Second, narrow policy interpretations can conflict with other narrow policy interpretations since regulations dictate courses of conduct which can run counter to civic integration consultants' own perceptions of their tasks. For instance, should they ask clients to quit their jobs to meet the obligations of the civic integration requirements?

And, given these findings, the following figure (see Figure 4) has been drafted to conceptualise street-level bureaucrats' policy enactment.

Figure 4

Street-level bureaucrats' policy enactment



Source: Own compilation.

The figure illustrates that policy interpretations can sit uneasily with each other. Not only can broad policy interpretations conflict with narrow policy interpretations, but also narrow interpretations with other narrow policy interpretations. There are no empirical findings suggesting that broad policy interpretations can clash with other broad policy interpretations. This might have to do with the fact that broad policy interpretations like general goals are too broad to conflict, and might even overlap with general features of the act, or other acts. Nonetheless, this does not mean that the thesis rules out the possibility that broad policy interpretations can conflict with each other. Rather, it is presumed that the broad policy interpretations are less likely to conflict with one another, and more likely to go against narrow policy interpretations.

And, subsequently, different policy interpretations can also fuel different policy translations, and vice versa. The fact that civic integration consultants refer to the content of the act in terms of its supposed goals and regulations to justify their perceived discretionary powers and customary services indicates that policy interpretations inform civic integration consultants' policy translations. And, the other way around, it appears that, for instance, few options to provide customisation also influences a civic integration consultant's policy interpretations. Hence, there appears to be an interplay between street-level bureaucrats' policy interpretations and translations, although it appears that the influence of civic integration consultants' policy translations on their interpretations is weaker since less observations point into that direction.

These findings are relevant to Stephan Ball's theory of enactment in which he argues that policy interpretations are fluid and can vary depending upon the context and discourse in which policy actors are embedded, thereby he theorises that policy interpretations can eventually become disconnected from policy translations (Ball et al., 2012). The fact that these aspects can become disconnected, however, may find its roots in competing policy interpretations. General goals like the integration and participation of newcomers might conflict with the requirement of drafting a PIP within ten weeks. In such cases, the incentive to draft a well considered PIP is sometimes stronger (e.g. interview 3, 6) than the regulation of drafting a mere PIP within ten weeks, or vice versa (e.g. interview 11). Such competing policy interpretations appear to distort the interplay between civic integration consultants' policy interpretation and translations, making civic integration consultants question their course of action. Therefore, conflicting policy interpretations should be considered an important step *in between* policy interpretations and policy translations which can account for a disconnection within street-level bureaucrats' policy enactment (Ball et al., 2012). This disconnection is visualised within Figure 4 by means of two arrows which are separated by a line, highlighting competing dynamics.

7.2 Understanding policy enactment through institutional factors

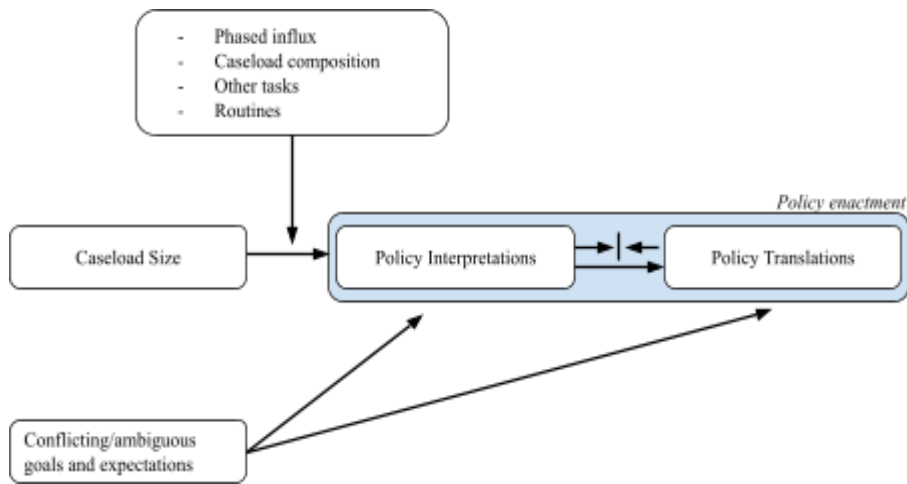
This thesis focused on the *work setting* i.e. caseload sizes and hiring practices, and *informal rules*, i.e. superiors' and colleagues' expectations, to assess the influence of institutional factors on street-level bureaucrats' policy enactment. Apparently, the caseload size of civic integration consultants varies. And, considering these different caseload sizes, some civic integration consultants proclaim that their caseload size influences their services while others, with high caseloads, believe that the caseload size has no influence on their services.

Accordingly, the following conceptual model has been compiled (see Figure 5) to visualise the observed causal relationships. To reiterate, two respondents declare that their caseload size does not affect them since they rely upon prioritisation practices and routines to manage their caseloads (interview 1, 8). Other civic integration consultants, however, argue that a high caseload influences their policy translations as it puts them under pressure and deprives them of their time to address problems quickly, p have in-depth meetings with clients etc. (interview 2, 3, 7, 9, 11, 12, 13, 14). Moreover, some civic integration consultants argue that other factors like the composition of the caseload, the intensity and frequency of phased influx of clients, and the degree to which other tasks need to be completed matter more than the overall caseload size (interview 2, 3, 12, 13).

These factors are identified as moderating factors influencing the degree to which the caseload size affects civic integration consultants' policy enactment. The assignment of many clients all at once, for instance, signifies that civic integration consultants need to complete many tasks simultaneously. Or, the fact that some clients require a lot of help or assistance deprive civic integration consultants of their time. This means that not the caseload size, but rather the associated tasks inherent to the caseload are relevant. This affects civic integration consultants' policy interpretations in terms of the amount of tasks they think they need to complete which, in turn, influences their policy translations by depriving them of the opportunity to do policy by, for instance, providing customisation,

Figure 5

The influence of institutional factors on street-level bureaucrats' policy enactment



Source: own compilation.

Furthermore, hiring practices and informal rules appear to have less influence on civic integration consultants' policy enactment. First, considering hiring practices, civic integration consultants have different expectations about how this will influence their services. Some believe that it won't make a difference (interview 1, 14), whereas others proclaim that it will help to reduce their caseload size (interview 3, 4, 5), or give them more time to engage with clients and provide customisation, i.e. influence their policy translation (interview 7, 8, 9, 10, 11). These results, however, need to be taken with a pinch of salt as respondents are speculating about how this will affect their services. Only one civic integration consultant, who recently got a new colleague, proclaims that he is already noticing the difference in terms of having more time on his hands (interview 9). Considering these findings, it is likely that, once again, the amount of tasks influence the extent to which they can provide services or provide customisation. However, because there are little observations suggesting what the influence of hiring practices will be in practice. Therefore, this indicator is not observable within the conceptual model.

Second, findings highlight that most civic integration consultants declare that they are not coping with ambiguous or conflicting goals and expectations. Some state that they are not there. whereas others are oblivious to goals and expectations of other reference groups. These observations can be the direct result of the fact that the Civic Integration Act came into force recently. This means that policy actors have had little time to formulate their goals and expectations in reference to the act. Yet there were three observations in which ambiguous or conflicting goals were identified which led to a clash between civic integration consultants' policy interpretations and also influenced their policy translations. This suggests that conflicting or ambiguous goals and expectations can induce tensions regarding civic integration consultants' policy interpretations while some expectations can also

influence civic integration consultants policy translations. The fact that some civic integration consultants, for instance, need to focus on keeping systems up-to-date at the cost of paying attention to clients, causes a disconnection between civic integration consultants' policy interpretations and translations (interview 2). This disconnection is visualised within Figure 5 by means of two arrows which are separated by a line, highlighting competing dynamics.

In sum, institutional factors can influence civic integration consultants' policy enactment. The work setting influences civic integration consultants' policy interpretations while informal rules can influence street-level bureaucrats' overall policy enactment, i.e. policy interpretations and translations and, thereby, also induce a disconnection within street-level bureaucrats' policy enactment. To some degree, these findings go hand in hand with the theoretical framework. First, the fact that civic integration consultants resort to routines vis-à-vis high caseloads goes hand in hand with Lipsky's theory (2010) on street-level bureaucracy. However, some moderating factors are also identified, suggesting that the caseload is not an obstacle to street-level bureaucrats' policy enactment per se. Rather, the amount of perceived tasks in relation to the caseload matter, suggesting that one cannot automatically assume that the caseload size influences street-level bureaucrats' policy enactment.

Second, *informal rules* influence policy enactment. This also goes, hand in hand with the theoretical assumptions, as the analysis demonstrates that informal rules can influence street-level bureaucrats' policy interpretations and translations simultaneously (Lipsky, 2010). Moreover, informales rules can cause disconnections within street-level bureaucrats' policy enactment (Ball et al., 2012). This finding sheds further light on street-level bureaucrats' understanding of citizenship and rights, and, thereby, partially fills a gap which was identified within the literature review and contribute to theory building.

7.3 Understanding policy enactment through actor-centred factors

The results demonstrate that civic integration consultants' *capabilities*, *preferences*, and *perceptions*, i.e. actor-centred factors, can influence their policy enactment, thereby the two-fold focus in terms of civic integration consultants' policy interpretations and translations sheds further light on the way in which these actor-centred factors influence civic integration consultants' policy enactments. To interpret these findings, another figure has been drafted to visualise and explain the presumed causal relationships (see Figure 6).

Regarding civic integration consultants' *capabilities*, the indicators preparation, time, information and experience affect civic integration consultants' policy enactment. A lack of preparation does not appear to influence civic integration consultants' policy translation. Only within the absence of adequate information and time did this become a problem for one particular civic integration

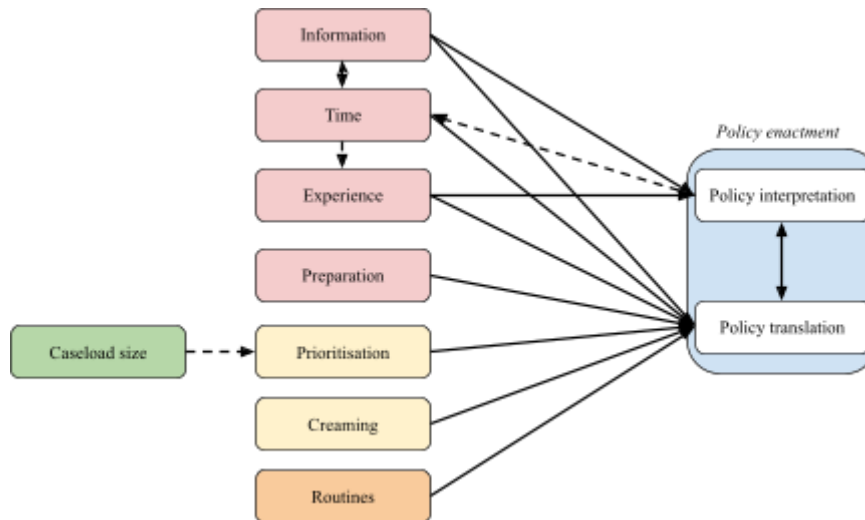
consultants in terms of the lack of preparation for bureaucracy. In this case, the lack of preparation deprived the civic integration consultant of her time as she needed more time to figure out how systems work, and, accordingly, this deprived them of their time to pay attention to their clients and, in some cases, also provide customisation. In that case, it appears that a lack of preparation is only problematic in case that there is also a shortage of time and information at stake.

The interplay between a shortage of time and limited access to available information can influence civic integration consultants' policy enactment. First, a lack of information can influence civic integration consultants' policy interpretations and can also lead to the endorsement of different policy interpretations. Furthermore, time shortage and/or limited access to information can either deprive civic integration consultants of the opportunity to provide customisation, or encourage them to reach decisions within the absence of policies and, thereby, provide customisation fueled by certain policy interpretations. In that regard, it appears that these indicators can influence civic integration consultants in distinct manners.

Civic integration consultants' policy interpretations appear to be key for explaining the degree to which such indicators affect the policy translation of civic integration consultants. Civic integration consultants who endorse broad goals like integration, participation and sustainable employment, are either affected or unaffected by time. On the one hand, they can struggle with the amount of time they have at their disposal since they want to get to know the client to draft adequate PIPs (interview 3, 4, 5). On the other hand, they are inclined to make decisions within the absence of policy or information by relying on their experience which influences their policy interpretations and translations (interview 3, 5, 9, 10). In that case, policy interpretations can be the missing link accounting for the extent to which capabilities influence civic integration consultants' policy enactment.

Figure 6

The Influence of actor-centred factors on street-level bureaucrats' policy enactment



Source: own compilation.

This is also the case in terms of how civic integration consultants prioritise between clients. Civic integration consultants who prioritise between clients alongside logics of urgency, problems, and consequences do not differentiate between specific clients or groups of clients. These logics can, to some extent, be linked to broad policy interpretations, whereas civic integration consultants who differentiate between specific groups of clients most or engage in creaming practices resort to such practices due to a high caseload. These practices are, to some of these respondents, also considered to be a means to provide customisation, suggesting that it influences their policy interpretations in terms of their perceived tasks as well as their policy translations.

In contrast, less empirical findings suggest that civic integration consultants resort to routines. There may be several reasons why this is the case. First, the reason might be that, at the time that the interviews were conducted, civic integration consultants were still preoccupied with figuring out their tasks, jobs, systems etc. This might have prevented them from incorporating routines. Second, some respondents state that the chaotic work setting and the phased influx of clients prevents them from developing routines (e.g. interview 2, 4, 5). Third, policy interpretations, e.g. the incentive to provide customisation, can block routines (interview 1, 11, 14). Accordingly, only within two interviews routines were observed (interview 8, 12). One civic integration consultant affirms that she relies upon routines to stay in control of her caseload (interview 8), whereas the other used routines to process clients efficiently, meaning that certain groups of clients would automatically integrate by means of the learning pathway. Hence, it appears that routines can negatively affect street-level bureaucrats' translations, i.e. the degree to which customisation is provided. This is also highlighted by Lipsky's (2010) theory of street-level bureaucracy who argues that street-level bureaucrats are inclined to resort

to routines as a result of limitations inherent to their job, yet policy interpretations can also block these routines.

7.4 Limitations

Notwithstanding the aforementioned findings, several limitations need to be taken into account. First, there are some methodological limitations. Several civic integration consultants from all over the Netherlands have been contacted to participate within this thesis. The response rate was, however, low as not many civic integration consultants were found willing to participate, suggesting that the respondents, who were eventually willing to participate, might have been dealing with other difficulties and problems in comparison to other civic integration consultants. Furthermore, no civic integration consultants from the south and west of the Netherlands were found willing to participate, and only two respondents were from small municipalities. And, given these methodological limitations, one can raise the question to what extent data is representative as results may be skewed.

Second, there are also some conceptual limitations inherent to this study which require further consideration. First, one of the main setbacks of this thesis is the fact that the case study focuses on an act which came into force recently. This means that some of the respondents did not have adequate time to develop routines and/or access to (available) information as some information was available yet. This might have influenced the results. In such cases, some of the findings might be distorted. Second, Stephan Ball's theory of enactment highlights the importance of contextualisation in the sense that the history, culture, discourse, and psychosociological dynamics all relate to policy enactment, yet this thesis only focused on institutional and actor-centred factors (Ball et al., 2012). This suggests that there may be more factors that can influence street-level bureaucrats' policy enactment which have not been considered by this thesis. In particular, the extent to which policy related factors, e.g. policy content, might influence the extent to which street-level bureaucrats uphold broad or narrow policy interpretations, and, thereby their policy translations. Accordingly, such factors require further attention in reference to street-level bureaucrats' policy enactment.

7.5 Implications

This thesis makes a significant contribution to existing academic research in reference to the employed theories and literature review. First, in light to the theoretical framework, i.e. Stephan Ball's theory of enactment (Ball et al., 2012), Scharpf's (1997) theory of actor-centred institutionalism, and Lipsky's (2010) theory of street-level bureaucracy, this thesis also makes a significant contribution in terms of theory-building. Regarding Stephan Ball's theory of enactment, further light is shed on the interplay between policy actors' interpretations and translations by introducing a typology which

differentiates between broad and narrow policy interpretations. Street-level bureaucrats can uphold different policy interpretations by emphasising different aspects of an act. At the same time, however, these different policy interpretations can also clash with one another. This collision of policy interpretations can, therefore, form an important step *in-between* policy actors interpretations and translations, i.e. and, therefore, ought to be considered another component of policy enactment. These insights also help to gain a deeper understanding of the causal relationships present within Lipsky's theory of street-level bureaucracy (2010) and Scharpf's (1997) theory of actor-centred institutionalism by showing that, first, limitations to the institutional setting and street-level bureaucrats responses vis-à-vis these limitations can affect their policy interpretations and translations in distinct manners, and even result in a disconnection between policy interpretations and translations.

Furthermore, these insights are also relevant in relation to the literature review. First, considering the local turn, findings demonstrate that a wide variety of factors can influence street-level bureaucrats' policy interpretations, translations and overall policy enactment within different situations and contexts (Emilsson, 2015; Gebhardt, 2016; Jørgensen, 2012; Oomen & Leenders, 2020; Scholten, 2016; Hepburn & Zapata-Barrero, 2014; Zapata-Barrero et al., 2017). Therefore, the thesis lends its support to the localist thesis by highlighting that a combination of different institutional and actor-centred factors can influence street-level bureaucrats' policy enactment in different manners (Dekker et al., 2015). And, second, these findings also are relevant to the stream of literature which focuses on street-level bureaucrats' roles in the provision of civic integration policies as this thesis partially fills the gap on street-level bureaucrats' conceptions of rights and citizenship by focusing on civic integration consultants' policy interpretations (Oomen & Leenders, 2020). Furthermore, as highlighted within the literature review, many street-level bureaucrats develop their own response repertoire in response to daily dilemmas. The thesis elucidates how these responses are developed while also demonstrating that one should not exclusively pay attention to the discretionary practices of street-level bureaucrats to study street-level bureaucrats' roles and influence on policy-making processes (Chang & Brewer, 2022). The degree to which street-level bureaucrats provide customisation is also an important indicator of their policy delivery as they make the deliberate decision to do something extra for some clients while, simultaneously, trying to treat clients equally.

And, these insights also have practical relevance by demonstrating that civic integration consultants' roles matter in the enforcement of civic integration policies. Different factors may influence their policy enactment, i.e. policy interpretations and translations. First, broad or narrow policy interpretations as well as the interplay between policy interpretations and translations, influence how civic integration policies are translated into practice. Accordingly, municipalities should be aware of the fact that civic integration consultants can resort to different policy interpretations and also cope with competing policy interpretations, especially when civic integration consultants exercise high degrees of discretion. The way in which policies are drafted, communicated and discussed can hereby

play an important role. Second, the thesis argues that institutional and actor-centred factors can affect civic integration consultants' policy interpretations and translations differently. Thus, municipalities should be aware of the (limitations of the) institutional setting in which civic integration consultants are embedded as well as civic integration consultants capabilities, perceptions and preferences influence policy interpretations and translations. For instance, little time, limited access to information or ambiguous or conflicting goals and ambitions can distort policy interpretations and, thereby, trigger different policy translations from civic integration consultants.

8. Conclusion

This thesis has aimed to unravel how institutional and actor-centred factors influence street-level bureaucrats' policy enactment. To this end, several steps were taken. First, the thesis considered the policy and organisational context of the Civic Integration Act which highlights that municipalities enjoy a lot of policy freedom to enforce the Civic Integration Act, suggesting that civic integration consultants' tasks may vary across municipalities. Subsequently, the literature review elaborated on the local turn and the role of street-level bureaucrats in the provision of civic integration policies. Hitherto, it remains unclear what the role local governments play in the provision of civic integration policies. Some researchers highlight that local governments should not be considered active policy actors in the provision of such policies, whereas others proclaim that similar policy practices or exclusively unique practices are observed at the local level (Dekker et al., 2015).

This thesis has tried to make a significant contribution to these streams of literature by employing a typical case study which focused on the role of civic integration consultants tasked with the enforcement of the Civic Integration Act 2021. By assessing civic integration consultants' policy enactment, i.e. their policy interpretations and translations, further light is shed on the response repertoires of civic integration consultants and their conceptions of the act. Thereby some theoretical gaps are also filled regarding the role of street-level bureaucrats within the field of civic integration (Oomen & Leenders, 2020).

And, regarding these set goals, the theoretical framework has defined the most important theoretical concepts: street-level bureaucrats and policy enactment. Subsequently, with the help of Lipsky's (2010) theory of street-level bureaucracy and Scharpf's (1997) theory of actor-centred institutionalism, institutional and actor-centred factors have been identified which may influence street-level bureaucrats' policy enactment. And, with the help of the theoretical framework, the methodological framework has shed light on the methodological approach of this study to answer the research question:

“How do institutional and actor-centred factors influence street-level bureaucrats' policy enactment, i.e. policy interpretation and translation?”

The results indicate that institutional factors, i.e. the *work setting* and *informal rules*, influence street-level bureaucrats' policy enactment. The work setting can influence their policy interpretations in terms of the amount of tasks which need to be completed and, thereby, also their policy translations, whereas informal rules affect street-level bureaucrats' overall policy enactment, induce tensions between different policy interpretations which can result in a disconnection between policy interpretations and translations. In contrast, actor-centred factors, and its interplay with institutional factors, can also influence street-level bureaucrats' policy interpretations and translations.

First, street-level bureaucrats' capabilities predominantly leave their mark on street-level bureaucrats' translations, even though their experience can also inform their policy interpretations. Second, data demonstrated that street-level bureaucrats can resort to different logics to prioritise between clients. Logics based on notions of urgency, problems and consequences mostly are observed with respondents who also tend to rely upon broad policy interpretations. Moreover, the caseload size can induce prioritisation between different types of clients. This is also perceived as a means to provide customisation by some civic integration consultants, meaning that prioritisation can become a guideline for the provision of customisation, suggesting that prioritisation influences street-level bureaucrats' policy translations. Furthermore, creaming can also be a means to provide customisation by making special arrangements for clients who are likely to succeed. And, third, it remains a topic of debate to what extent routines influence street-level bureaucrats' policy enactment. Some findings suggest that routines affect street-level bureaucrats' policy translations, i.e. the degree to which customisation is provided, yet policy interpretations can also block out routines. Nonetheless, no determinative conclusions are reached since few respondents have routines.

These insights shed further light on the roles of street-level bureaucrats, although the interplay between street-level bureaucrats' policy interpretations and translations requires further consideration as they to be the missing link accounting for the different ways in which street-level bureaucrats enact policy.

This thesis has paved the way for future research, and would like to make two suggestions for future follow-up research. First, in light of the aforementioned limitations inherent to this thesis, it is important to repeat this study by focusing on an act which has been enforced by street-level bureaucrats for some time. The Civic Integration Act came into force on January 1st 2022, which suggests that at the time that the semi-structured interviews were conducted, civic integration consultants have had little time to develop routines. Local policies had not been drafted yet, and systems still had to be figured out by respondents. This means that some of the indicators might not have been present or have had little time to develop, whereas others might have been extensively present such as a shortage of information or time. Therefore, it would be important to repeat this study with another act to assess the extent to which institutional and actor-centred factors affect street-level bureaucrats' policy enactment.

Second, this thesis highlights that street-level bureaucrats might cope with different broad and/or narrow policy interpretations which may sit uneasily with each other. It is presumed that these frictions between are an important component of street-level bureaucrats' policy enactment serving as a catalyst for different policy translations, and a disconnection between policy interpretations and translations. Accordingly, the interaction between different policy interpretations, policy

interpretations and translations, and the causes for these different tensions ought to be further investigated.

References

- Adams, W. C. (2015). Conducting semi-structured interviews. In K. E. Newcomer, H. P. Hatry & J. S. Wholey (Eds.), *Handbook of Practical Program Evaluation* (4th ed., pp. 492-505). Jossey-Bass. <https://doi.org/10.1002/9781119171386.ch19>
- Ahlén, A., & Boräng, F. (2018). Immigration control in disguise?: civic integration policies and immigrant admission. *Nordic Journal of Migration Research*, 8(1), 3–14. <https://doi.org/10.1515/njmr-2018-0004>
- Algemene Rekenkamer. (2017). *Inburgering. Eerste resultaten van de wet inburgering 2013*. <https://www.rekenkamer.nl/publicaties/rapporten/2017/01/24/inburgering>
- Bakkær Simonsen, K. (2017). (dissertation). *Do they belong?: Host national boundary drawing and immigrants' identificational integration*. [doctoral dissertation, Aarhus University]. Forlaget Politica. <https://politica.dk/politicas-phd-serie/kristina-bakkaer-simonsen>
- Ball, S. J. (2015). What is policy? 21 years later: reflections on the possibilities of policy research. *Discourse: Studies in the Cultural Politics of Education*, 36(3), 306–313. <https://doi.org/10.1080/01596306.2015.1015279>
- Ball, S. J., Maguire, M., Braun, A., & Hoskins, K. (2011a). Policy actors: Doing policy work in Schools. *Discourse: Studies in the Cultural Politics of Education*, 32(4), 625–639. <https://doi.org/10.1080/01596306.2011.601565>
- Ball, S. J., Maguire, M., Braun, A., & Hoskins, K. (2011b). Policy subjects and policy actors in schools: some necessary but insufficient analyses. *Discourse: Studies in the Cultural Politics of Education*, 32(4), 611–624. <https://doi.org/10.1080/01596306.2011.601564>
- Ball, S. J., Maguire, M., & Braun, A. (2012). *How schools do policy: Policy enactments in secondary schools* (1st ed). Routledge. <https://doi.org/10.4324/9780203153185>

- Baycheva-Merger, T., Sotirov, M., Holmgren, S., & Selter, A. (2018). Institutional and Actor-Oriented Factors Constraining Expert-Based Forest Information Exchange in Europe: A Policy Analysis from an Actor-Centred Institutional Approach. *Forests*, 9(3). <https://doi.org/10.3390/f9030129>
- Belabas, W., & Gerrits, L. (2017). Going the extra mile? how street-level bureaucrats deal with the integration of immigrants. *Social Policy & Administration*, 51(1), 133–150. <https://doi.org/10.1111/spol.12184>
- Bennett, A. (2022). Drawing contingent generalizations from case studies. In J. Widner, M. Woolcock & D. Ortega Nieto, (Eds.), *The case for case studies: methods and applications in international development* (pp. 62-86). Cambridge University Press. <https://doi.org/10.1017/9781108688253.005>
- Blankvoort, N., Laliberte Rudman, D., van Hartingsveldt, M., & Krumeich, A. (2023). ‘New’ dutch civic integration: learning ‘spontaneous compliance’ to address inherent difference. *Critical Discourse Studies*, 1–19. <https://doi.org/10.1080/17405904.2023.2179648>
- Bleijenbergh, I. (2013). *Kwalitatief Onderzoek in Organisaties*. Boom Lemma uitgevers.
- Blik op werk. (n.d.). *Over blik op werk*. <https://www.blikopwerk.nl/over-blik-op-werk>
- Bonjour, S., & Duyvendak, J. W. (2018). The “migrant with poor prospects”: racialized intersections of class and culture in dutch civic integration debates. *Ethnic and Racial Studies*, 41(5), 882–900. <https://doi.org/10.1080/01419870.2017.1339897>
- Borkert, M., & Caponio, T. (2010). Introduction: the local dimension of migration policymaking. In T. Caponio & M. Borkert (Eds.), *The Local Dimension of Migration Policymaking* (pp. 9–32). Amsterdam University Press. <http://www.jstor.org/stable/j.ctt46n0xg.3>
- Bowen, G. A. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal*, 9(2), 27–40. <http://dx.doi.org/10.3316/QRJ0902027>

- Braun, A., Ball, S. J., Maguire, M., & Hoskins, K. (2011). Taking context seriously: Towards explaining policy enactments in the secondary school. *Discourse: Studies in the Cultural Politics of Education*, 32(4), 585–596. <https://doi.org/10.1080/01596306.2011.601555>
- Brodkin, E. Z. (2012). Reflections on street-level bureaucracy: past, present, and future. *Public Administration Review*, 72(6), 940–949. <https://doi-org.ru.idm.oclc.org/10.1111/j.1540-6210.2012.02657.x>
- Buro voor jou. (2021, October 11). *Consulent inburgering: Dit is wat je gaat doen!*. <https://burovoorjou.nl/consulent-inburgering-dit-is-wat-je-gaat-doen/>
- Camillo, C. A. (2017). Street-level bureaucracy. In A. Farazmand (Ed.), *Global encyclopedia of public administration, public policy, and governance*, (pp. 1-5). Springer Cham. https://doi.org/10.1007/978-3-319-31816-5_654-1
- Caponio, T., Jubany Baucells, O., & Güell, B. (2016). Civic integration policies from below: accounting for processes of convergence and divergence in four european cities. *Ethnic and Racial Studies*, 39(5), 878–895. <https://doi.org/10.1080/01419870.2015.1080379>
- Careja, R. (2019). Making good citizens: local authorities' integration measures navigate national policies and local realities. *Journal of Ethnic and Migration Studies*, 45(8), 1327–1344. <https://doi.org/10.1080/1369183x.2018.1441613>
- Cicchetti, D., & Rogosch, F. A. (1996). Equifinality and multifinality in developmental psychopathology. *Development and Psychopathology*, 8(4), 597-600. <https://doi.org/10.1017/S0954579400007318>
- Coa. (n.d.a). *Housing of status holders*. <https://www.coa.nl/en/housing-status-holders>
- Coa. (n.d.b). *The coa*. <https://www.coa.nl/en/coa>

- Chang, A., & Brewer, G. A. (2022). Street-level bureaucracy in public administration: a systematic literature review. *Public Management Review*, 1-21.
<https://doi.org/10.1080/14719037.2022.2065517>
- Conaty, F. (2021). Abduction as a methodological approach to case study research in management accounting — an illustrative case. *Accounting, Finance & Governance Review*, 27(1), .
<https://doi.org/10.52399/001c.22171>
- Crowe, S., Creswell, K., Robertson, A., Huby, G., Avery, A., & Sheikh, A. (2011). The case study approach. *BMC Medical Research Methodology*, 11(100).
<https://doi.org/10.1186/1471-2288-11-100>
- Da Rocha Soares Ferreira, V., & Medeiros, J. J. (2016). Factors that shape the behavior of street-level bureaucrats in the public policy implementation process. *Cadernos Ebape.br*, 14(3), 776–793.
<http://dx.doi.org/10.1590/1679-395129522>
- Dekker, R., Emilsson, H., Krieger, B., & Scholten, P. (2015). A local dimension of integration policies? A comparative study of berlin, malmö, and rotterdam. *International Migration Review*, 49(3), 633–658. <https://doi.org/10.1111/imre.12133>
- De Waal, T. (2020). Conditional Belonging: Evaluating Integration Requirements from a Social Equality Perspective. *Journal of Intercultural Studies*, 41(2), 231-247.
<https://doi.org/10.1080/07256868.2020.1724906>
- Dewalt, K. M., & Dewalt, B. R. (2002). *Participant observation: A guide for fieldworkers*. Altamira Press.
https://books.google.nl/books?id=p1wcO3UNXQ4C&pg=PA1&hl=nl&source=gbs_toc_r&cad=3#v=onepage&q&f=false
- Divosa. (n.d.a). *Handreiking brede intake en PIP*.
<https://www.divosa.nl/publicaties/brede-intake-en-pip>

- Divosa. (n.d.b). *Handreiking inburgeringsplichtige gezinsmigranten*.
<https://www.divosa.nl/publicaties/inburgeringsplichtige-gezinsmigranten/handreiking-inburgeringsplichtige-gezinsmigranten#achtergrond>
- Divosa. (n.d.c). *Handreiking leerroutes*. <https://www.divosa.nl/publicaties/handreiking-leerroutes>
- Divosa. (n.d.d). *Home* [LinkedIn page]. LinkedIn. Retrieved May 5, 2022, from <https://www.linkedin.com/company/divosa/>
- Dubois, A., & Gadde, L.-E. (2002). Systematic combining: An abductive approach to case research. *Journal of Business Research*, 55(7), 553–560. [https://doi.org/10.1016/s0148-2963\(00\)00195-8](https://doi.org/10.1016/s0148-2963(00)00195-8)
- Ellermann, A. (2020). Discrimination in migration and citizenship. *Journal of Ethnic and Migration Studies*, 46(12), 2463–2479. <https://doi.org/10.1080/1369183x.2018.1561053>
- Emilsson, H. (2015). A national turn of local integration policy: Multi-level governance dynamics in Denmark and Sweden. *Comparative Migration Studies*, 3(7). <https://doi.org/10.1186/s40878-015-0008-5>
- Emilsson, H. (2016). *Paper planes: Labour migration, integration, policy and the state*. Malmö University.
- Ersanilli, E., & Koopmans, R. (2011). Do immigrant integration policies matter? A three-country comparison among Turkish immigrants. *West European Politics*, 34(2), 208–234. <https://doi.org/10.1080/01402382.2011.546568>
- Eriksson, E., & Johansson, K. (2022). Street-level bureaucrat in the introduction programme – client-centred and authority-centred strategies to handle challenging working conditions. *Nordic Social Work Research*, 12(5), 698–715. <https://doi.org/10.1080/2156857x.2020.1869063>
- Fokkink, N. (2022, July 15). De nieuwe wet inburgering: wat zijn nu de regels?. *Verblijfblog*. <https://verblijfblog.nl/de-nieuwe-wet-inburgering-wat-zijn-nu-de-regels/>

- Gebhardt, D. (2016). When the state takes over: Civic integration programmes and the role of cities in immigrant integration. *Journal of Ethnic and Migration Studies*, 42(5), 742–758. <https://doi.org/10.1080/1369183x.2015.1111132>
- Gerring, J. (2004). What is a case study and what is it good for?. *American Political Science Review*, 98(2), 341–354. <https://doi.org/10.1017/s0003055404001182>
- Gerring, J. (2007). *Case study research: Principles and practices*. Cambridge University Press.
- Gijsberts, M., Huijnk, W., & Dagevos, J. (2012). *Jaarrapport integratie 2011*. Sociaal en Cultureel Planbureau. https://www.eumonitor.nl/9353000/1/j4nvgs5kkg27kof_j9vvik7mlc3gyxp/vix6h8qdsgvi/f=/blg154673.pdf
- Glyniadaki, A. (2019). *Migration in policy practice: Identity conflicts and discretionary decisions at the front lines* [Doctoral dissertation, The London School of Economics and Political Science]. LSE Theses online. <https://etheses.lse.ac.uk/4350/>
- Glyniadaki, K. (2022). Street-level actors, migrants, and gender: dealing with divergent perspectives. *Administration & Society*, 54(3), 451-478. <https://doi.org/10.1177/00953997211031464>
- Goodman, S. W. (2010). Integration requirements for integration's sake? Identifying, categorising and comparing civic integration policies. *Journal of Ethnic and Migration Studies*, 36(5), 753–772. <https://doi.org/10.1080/13691831003764300>
- Goodman, S. W. (2011). Controlling immigration through language and country knowledge requirements. *West European Politics*, 34(2), 235–255. <https://doi.org/10.1080/01402382.2011.546569>
- Goodman, S. W. (2014). *Immigration and membership politics in Western Europe*. Cambridge University Press. <https://doi-org.ru.idm.oclc.org/10.1017/CBO9781107477865>

- Goodman, S. W. (2015). Conceptualizing and measuring citizenship and integration policy: past lessons and new approaches. *Comparative Political Studies*, 48(14), 1905–1941. <https://doi.org/10.1177/0010414015592648>
- Goodman, S. W., & Wright, M. (2015). Does mandatory integration matter? Effects of civic requirements on immigrant socio-economic and political outcomes. *Journal of Ethnic and Migration Studies*, 41(12), 1885–1908. <https://doi.org/10.1080/1369183x.2015.1042434>
- Government of the Netherlands. (n.d.). *New civic integration act 2021*. <https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-act>
- Gschwend, T., & Schimmelfennig, F. (2007). Introduction: designing research in political science — a dialogue between theory and data. In T. Gschwend & F. Schimmelfennig (Eds.), *Research design in political science: how to practice what they preach* (pp. 1–18). Palgrave Macmillan. https://doi.org/10.1057/9780230598881_1
- Hagelund, A. (2010). Dealing with the dilemmas: integration at the street-level in Norway. *International Migration*, 48(2), 79–102. <https://doi.org/10.1111/j.1468-2435.2008.00497.x>
- Hepburn, E., & Zapata-Barrero, R. (2014). Introduction: immigration policies in multilevel states. In E. Hepburn & R. Zapata-Barrero (Eds.), *The policies of immigration in multi-level states* (pp. 3–15). Palgrave Macmillan. https://doi-org.ru.idm.oclc.org/10.1057/9781137358530_1
- Hoehne, J., & Michalowski, I. (2016). Long-term effects of language course timing on language acquisition and social contacts: Turkish and Moroccan immigrants in Western Europe. *International Migration Review*, 50(1), 133–162. <https://doi.org/10.1111/imre.12130>
- Jonitz, E., Schiller, P., & Scholten, P. (2022). *Immigrant integration in small and medium-sized towns and rural areas: local policies and policymaking relations in the Netherlands* (Country reports on multi-level dynamics). Whole-comm.

<https://migrant-integration.ec.europa.eu/system/files/2022-11/6%20Netherlands%20-%20WholeCOMM%20multilevel%20dynamics.pdf>

Joppke, C. (2007a). Beyond national models: civic integration policies for immigrants in western europe. *West European Politics*, 30(1), 1–22. <https://doi.org/10.1080/01402380601019613>

Joppke, C. (2007b). Immigrants and Civic Integration in Western Europe. In K. G. Banting, T. J. Courchene & F. L. Seidle (Eds.), *Belonging? Diversity, recognition and shared citizenship in Canada* (Vol. 3, pp. 1–30). McGill-Queen's University Press.

Joppke, C. (2007c). Transformation of immigrant integration: civic integration and antidiscrimination in the netherlands, france, and germany. *World Politics*, 59(2), 243–273. <https://doi.org/10.1353/wp.2007.0022>

Jørgensen, M. B. (2012). The diverging logics of integration policy making at national and city level. *International Migration Review*, 46(1), 244–278. <https://doi.org/10.1111/j.1747-7379.2012.00886.x>

Kawulich, B. B. (2005). Participant observation as a data collection method. *Forum: Qualitative Social Research*, 6(2).

Keulemans, S., & Van de Walle, S. (2018). Understanding street-level bureaucrats' attitude towards clients: Towards a measurement instrument. *Public Policy and Administration*, 35(1), 84-113. <https://doi.org/10.1177/0952076718789749>

King, G., Keohane, R. O., & Verba, S. (1994). *Designing social inquiry. Scientific inference in qualitative research*. Princeton University Press. <https://doi.org/10.1515/9781400821211>

Koopmans, R. (2010). Trade-offs between equality and difference: immigrant integration, multiculturalism and the welfare state in cross-national perspective. *Journal of Ethnic and Migration Studies*, 36(1), 1–26. <https://doi.org/10.1080/13691830903250881>

- Kos, S., Maussen, M., & Doornik, J. (2016). Policies of exclusion and practices of inclusion: how municipal governments negotiate asylum policies in the Netherlands. *Territory, Politics, Governance*, 4(3), 354–374. <https://doi.org/10.1080/21622671.2015.1024719>
- Kostakopoulou, D. (2010). The anatomy of civic integration. *The Modern Law Review*, 73(6), 933–958. <https://doi.org/10.1111/j.1468-2230.2010.00825.x>
- Larin, S. J. (2020). Is it really about values? civic nationalism and migrant integration. *Journal of Ethnic and Migration Studies*, 46(1), 127–141. <https://doi.org/10.1080/1369183x.2019.1591943>
- Leuffen, D. (2007). Case selection and selection bias in small-n research. In T. Geschwend & F. Schimmelfennig (Eds.), *Research design in Political Science how to practice what they preach* (pp. 145-160). Palgrave Macmillan. https://doi.org/10.1057/9780230598881_8
- Lipsky, M. (1969). *Toward a theory of street-level bureaucracy*. Institute for Research on Poverty, University of Wisconsin. https://www.canonsociaalwerk.eu/1969_lipsky/1969_Lipsky_Toward%20a%20theory%20of%20street%20level%20bureaucracy.pdf.
- Lipsky, M. (1971). Street-level bureaucracy and the analysis of urban reform. *Urban Affairs Quarterly*, 6(4), 391–409. <https://doi.org/10.1177/107808747100600401>
- Lipsky, M. (2010). *Street-level bureaucracy, 30th Ann. Ed.: dilemmas of the individual in public services*. Russell Sage Foundation.
- Lopes, A. C. (2016). The theory of enactment by Stephen Ball: and what if the notion of discourse was different?. *Education Policy Analysis Archives*, 24(25), 1-19. <http://dx.doi.org/10.14507/epaa.v24.2111>
- Maguire, M., Braun, A., & Ball, S. (2015). ‘Where you stand depends on where you sit’: The social construction of policy enactments in the (English) secondary school. *Discourse: Studies in the Cultural Politics of Education*, 36(4), 485–499. <https://doi.org/10.1080/01596306.2014.977022>

- Mahnig, H. (2004). The politics of minority–majority relations: How immigrant policies developed in paris, berlin and zurich. In R. Penninx, K. Kraal, M. Martiniello & S. Vertovec (Eds.), *Citizenship in european cities* (pp 17–38). Aldershot. <https://doi.org/10.4324/9781315260228>
- Marshall, C., & Rossman, G. B. (1989). *Designing qualitative research*. Sage.
- Mattei, P., & Broeks, M. (2018). From multiculturalism to civic integration: citizenship education and integration policies in the netherlands and england since the 2000s. *Ethnicities*, 18(1), 23–42. <https://doi.org/10.1177/1468796816676845>
- Mikkelsen, K. S., Madsen, J. K., & Baekgaard, M. (2023). Is stress among street-level bureaucrats associated with experiences of administrative burden among clients? A multilevel study of the danish unemployment sector. *Public Administration Review*, 1-13. <https://doi.org/10.1111/puar.13673>
- M50. (n.d.). *Over M50*. <https://www.middelgrotegemeenten.nl/strag+m50/default.aspx>
- Nothdurfter, U., & Hermans, K. (2018). Meeting (or not) at the street level? a literature review on street-level research in public management, social policy and social work. *International Journal of Social Welfare*, 27(3), 294–304. <https://doi.org/10.1111/ijsw.12308>
- Odé, A. (2008). Contemporary integration policies in europe: civic integration programmes and the legal, social and cultural position of non-citizens. *European Journal of Social Security*, 10(1), 7–23. <https://doi.org/10.1177/138826270801000102>
- Oomen, B., & Leenders, E. (2020). Symbolic laws, Street-level Actors: Everyday Bordering in Dutch Participation Declaration Workshops. In M. Ambrosini, M. Cinalli & D. Jacobson, (Eds.), *Migration, Borders and Citizenship. Between policy and public spheres* (pp. 265–294). Palgrave Macmillan. https://doi-org.ru.idm.oclc.org/10.1007/978-3-030-22157-7_12
- Op den Camp, L., & Le Noble, G. (2021, December 1). *Samenloop tussen de nieuwe wet inburgering en de participatiewet*. Schulinc.

<https://www.schulinck.nl/opinie/samenloop-tussen-de-nieuwe-wet-inburgering-en-de-participatiewet/>

Oppermann, M. (2000). Triangulation — a methodological discussion. *International Journal of Tourism Research*, 2(2), 141–145.
[https://doi-org.ru.idm.oclc.org/10.1002/\(SICI\)1522-1970\(200003/04\)2:2<141::AID-JTR217>3.0.CO;2-Uopen_in_newISSN](https://doi-org.ru.idm.oclc.org/10.1002/(SICI)1522-1970(200003/04)2:2<141::AID-JTR217>3.0.CO;2-Uopen_in_newISSN)

Overheid. (2022, January 1st). *Wet inburgering 2021*.
<https://wetten.overheid.nl/BWBR0044770/2022-01-01>

Penninx, R. (2020). Postwar immigration and integration policies in the netherlands: an unstable marriage. In M. Duszcyk, M. Pachocka & D. Pszczółkowska (Eds.), *Relations between immigration and integration policies in Europe: challenges, opportunities and perspectives in selected eu member states* (pp. 77–105). Routledge. <https://doi.org/10.4324/9780429263736>

Poppelaars, C., & Scholten, P. (2008). Two worlds apart: the divergence of national and local immigrant integration policies in the netherlands. *Administration & Society*, 40(4), 335–357.
<https://doi.org/10.1177/0095399708317172>

Price, J., & Spencer, S. (n.d.). *City-level responses to migrant families with restricted access to welfare benefits*. *Compass*.
https://www.compas.ox.ac.uk/wp-content/uploads/PR-2014-No_Recourse_Public_Funds_Cities_Executive_English.pdf

Ratzmann, N. (2021). Deserving of social support? street-level bureaucrats' decisions on eu migrants' benefit claims in germany. *Social Policy and Society*, 20(3), 509–520.
<https://doi.org/10.1017/S1474746421000026>

Rijksoverheid. (n.d.a). *Huisvesting* *statushouders*.
<https://www.rijksoverheid.nl/onderwerpen/asielbeleid/huisvesting-asielzoekers-met-verblijfsvergunning>

Rijksoverheid. (n.d.b). *Wet* *inburgering* *2013*.
<https://www.rijksoverheid.nl/onderwerpen/inburgeren-in-nederland/wet-inburgering-2013#:~:text=Nieuwkomers%20die%20voor%201%20januari,helpen%2C%20bijvoorbeeld%20met%20persoonlijke%20begeleiding>

Ryan, K. (2013). *Policy without evidence? The Australian Citizenship Test* [Doctoral dissertation, Swinburne University of Technology]. Swinburne Research Bank.
<https://researchbank.swinburne.edu.au/file/f75158db-9856-4cf7-829f-b63a0794adbf/1/Kerry%20Ryan%20Thesis.pdf>

Saldaña, J. (2013). *The coding manual for qualitative researchers* (2nd ed.). Sage.
<https://emotrab.ufba.br/wp-content/uploads/2020/09/Saldana-2013-TheCodingManualforQualitativeResearchers.pdf>

Scharpf, F. W. (1997). *Games real actors play: actor-centered institutionalism in policy research*. Westview Press.

Scholten, P. (2016). Between national models and multi-level decoupling: the pursuit of multi-level governance in dutch and uk policies towards migrant incorporation. *Journal of International Migration and Integration*, 17(4), 973–994. <https://doi.org/10.1007/s12134-015-0438-9>

Scholten, N., Ghebreab, S., & De Waal, T. (2019). *Civic Integration as a Key Pillar in Societal Resilience of Newcomers*. Foundation Civic. <https://stichtingcivic.nl/dutch-civic-integration-holistic-review-of-best-practices/>

- Sevä, M. (2015). *The decisive role of street-level bureaucrats in environmental management* [Doctoral dissertation, Luleå University of Technology]. Digitala Vetenskapliga Arkivet. <http://www.diva-portal.org/smash/get/diva2:990441/FULLTEXT01.pdf>
- Sociale Zaken Maastricht Heuvelland. (n.d.). *Participatieplaats*. <https://www.socialezaken-mh.nl/werk-vinden/participatieplaats#:~:text=Een%20participatieplaats%20is%20een%20tijdelijke,afstand%20tot%20de%20arbeidsmarkt%20hebben>
- Rahman, M. S. (2016). The advantages and disadvantages of using qualitative and quantitative approaches and methods in language “testing and assessment” research: a literature review. *Journal of Education and Learning*, 6(1), 102–112. <https://doi.org/10.5539/jel.v6n1p102>
- Singh, P., Heimans, S., & Glasswell, K. (2014). Policy enactment, context and performativity: Ontological politics and researching Australian national partnership policies. *Journal of Education Policy*, 29(6), 826–844. <https://doi.org/10.1080/02680939.2014.891763>
- Slade, C. (2010). Civic Integration in the Netherlands. In C. Slade & M. Möllering (Eds.), *From migrant to citizen: testing language, testing culture* (pp. 125–144). Palgrave Macmillan. <https://dx.doi.org/10.1057/9780230281400>
- Stimulansz. (n.d.a). *Wet inburgering 2021*. <https://www.stimulansz.nl/nieuwe-wet-inburgering-2021/#1664805829680-17718e04-058a>
- Stimulansz. (n.d.b). *Wat doet een consulent inburgering?*. <https://www.stimulansz.nl/consulent-inburgering-klantmanager/#:~:text=De%20consulent%20Wet%20inburgering%20houdt,de%20functienaam%20inderdaad%20consulent%20inburgering>
- Swanborn, P. G. (2010). *Case study research: What, why and how?*. SAGE Publications. <https://doi.org/10.4135/9781526485168>
- The Hague. (2017, April 10). *Status holders in the Hague*. Retrieved April 30, 2023, from <https://www.denhaag.nl/en/integration-and-naturalisation/status-holders-in-the-hague.htm>

- Thomas, G. (2010). Doing case study: Abduction not induction, phronesis not theory. *Qualitative inquiry*, 16(7), 575-582. <https://doi-org.ru.idm.oclc.org/10.1177/1077800410372601>
- Thomas, G. (2016). *How to do your case study* (2nd ed.). Sage Publications Ltd. https://www.google.nl/books/edition/How_to_Do_Your_Case_Study/CMiICwAAQBAJ?hl=nl&gbpv=1&dq=Case-Study%27s:+wat+Wanneer+en+Hoe%3F+pdf&printsec=frontcover
- Van Dam, M., & Brummelkamp, G. (2020). *Uitvoeringstoets Wet Inburgering* (Nr. 1.). VNG Realisatie. https://vng.nl/sites/default/files/2020-12/eindrapportage_ut_wet_inburgering_versie_1.0.pdf
- Van Thiel, S. (2015). *Bestuurskundig onderzoek een methodologische inleiding* (3rd, ed.). Coutinho.
- Van Oers, R. (2021). Deserving citizenship in germany and the netherlands. citizenship tests in liberal democracies. *Ethnicities*, 21(2), 271–288. <https://doi.org/10.1177/1468796820965785>
- Verger, A., & Skedsmo, G. (2021). Enacting accountabilities in education: exploring new policy contexts and theoretical elaborations. *Educational Assessment, Evaluation and Accountability: International Journal of Policy, Practice and Research*, 33(3), 391–401. <https://doi.org/10.1007/s11092-021-09371-x>
- Vermeulen, F., & Stotijn, R. (2010). Local policies concerning unemployment among immigrant youth in amsterdam and in berlin: towards strategic replacement and pragmatic accommodation. In T. Caponio & M. Borkerts (Eds.), *The Local Dimension of Migration Policymaking* (pp. 109-134). Amsterdam University Press. <https://www.jstor.org/stable/j.ctt46n0xg.7>
- VNG. (2022a). *Gegevensuitwisseling gemeenten en ketenpartners nieuwe wet inburgering*. https://vng.nl/sites/default/files/2021-06/vng_handreiking_gegevensuitwisseling-wet_inburgering_gemeenten.pdf

- VNG. (2022b). *Samenloop wet inburgering 2021 en participatiewet*.
<https://vng.nl/sites/default/files/2022-02/Toezicht-en-handhaving-samenloop-wet-inburgering-en-participatiewet.pdf>
- Volckmar-Eeg, M. G., & Vassenden, A. (2022). Emotional creaming: street-level bureaucrats' prioritisation of migrant clients 'likely to succeed' in labour market integration. *International Journal of Social Welfare*, 31(2), 165–175. <https://doi.org/10.1111/ijsw.12510>
- Vollstedt, M., & Rezat, S. (2019). An Introduction to grounded theory with a special focus on axial coding and the coding paradigm. In G. Kaiser & N. Presmeg (Eds.), *Compendium for early career researchers in mathematics education* (pp. 81-100). Springer cham.
https://doi.org/10.1007/978-3-030-15636-7_4
- Widner, J., Woolcock, M., & Ortega Nieto, D. (2022). Using case studies to enhance the quality of explanation and implementation. In J. Widner, M. Woolcock, & D. Ortega Nieto (Eds.), *The case for case studies: Methods and applications of methodological developments* (pp. 1-26). Cambridge University Press. <https://doi.org/10.1017/9781108688253>
- Zapata-Barrero, R., Caponio, T., & Scholten, P. (2017). Theorizing the 'local turn' in a multi-level governance framework of analysis: A case study in immigrant policies. *International Review of Administrative Sciences*, 83(2), 241-246. <https://doi.org/10.1177/0020852316688426>
- Zhang, Y., & Wildemuth, B. M. (2005). Qualitative analysis of content. *Semantic scholar*, 1-12.
<https://www.semanticscholar.org/paper/Qualitative-Analysis-of-Content-by-Zhang-Wildemuth/b269343ab82ba8b7a343b893815a0bae6472fcca>
- Zincone, G., & Caponio, T. (2006). The Multilevel Governance of Migration. In R. Penninx, M. Berger, & K. Kraal (Eds.), *The Dynamics of Migration and Settlement in Europe* (pp. 269–304). Amsterdam University Press. <https://doi.org/10.1515/9789048504176-010>

Appendix A - The Civic Integration Act 2021

Table A1

Similarities and differences between asylees and migrants regarding their obligations towards the Civic Integration Act 2021

Status holders	Family migrants
Comprehensive intake (including learnability test)	Comprehensive intake (including learnability test)
Personal integration and Participation Plan (PIP)	Personal integration and participation plan (PIP)
Municipality decides which languages courses will be attended, and pays for them	Pays for the courses themselves and, therefore, can choose their own language school. The municipality can make recommendations.
Module: Labour market & participation (MAP)	Module: Labour market & participation (MAP)
Participation statement process (PVT)	Participation statement process (PVT)
Financial unburdening	Not applicable
Social guidance	Not applicable

Note. Information about the differences between status holders and family migrants are from *Handreiking inburgeringsplichtige gezinsmigranten*, by Divosa, n.d.b (<https://www.divosa.nl/publicaties/inburgeringsplichtige-gezinsmigranten/handreiking-inburgeringsplichtige-gezinsmigranten#achtergrond>). Copyright n.d.X by Divosa. The data about family migrants are from *New Civic Integration Act 2021*, by Government of the Netherlands, n.d. (<https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-act>). Copyright n.d. by Government of the Netherlands.

Appendix B - Exploratory interview guide

Civic integration consultants' policy enactment

Consent form and interview design

- Consent form & explanation of the design of this interview
- Introduction and background information about the study

Background questions

- Could you briefly introduce yourself?
- What is your current position?
- How long have you been working for municipality X/organisation Y?
- What position did you hold before the introduction of the Civic Integration Act 2021?
- What is your background in terms of studies and work experience?

The Civic Integration Act 2021

- Could you briefly describe the new Civic Integration Act 2021?
- How did the municipality decide to enforce the act?
- Could you give your opinion about the Civic Integration Act? Do you believe that this will work?
-

Discretionary powers

- Could you please describe your tasks and responsibilities in reference to the act?
- To what extent can you reach decisions independently?
- How much influence do you have on the enforcement of the act?
- What kind of role do sanctions play in reference to your tasks and responsibilities?; What does your sanction policy look like?

Customisation

- How does customisation play a role in the implementation of the new Integration Act?
- How do you provide customisation in reference to the enforcement of the act?
- To what extent are you able to provide customisation?

Resources

- How were you prepared for the new Civic Integration Act?
- In case of even questions or uncertainties, where do you find you information?

- How do you make decisions? What are they based on?
- How does your caseload relate to your services? (sufficient time for decision-making?)

Supply and demand

- How has the expansion of your services, or the transition to the new Integration Act, affected your relationship with clients?
- How do you make sure that sufficient time and attention is given to each client?
- How much time do you spend on each client?; With what kind of questions do clients come to you?

Expectations

- What goals does your organisation have regarding the Civic Integration Act?
- What kind of expectations do you have from yourself? When do you think that you have done a good job?; What could be done better?
- What expectations do clients have of you?
- What expectations do managers have of you?
- How do you deal with these expectations? Does this affect your services?

Routine & priorities

- Could you describe your daily activities?
- To what extent do you experience stress in relation to job?
- How do you cope with stress? What do you do, if you get stressed out?
- How do you deal with difficult cases?
- Do you have some success stories? What has been your part in this story?

Closing

- Did the interview meet your expectations?
- Are there things, for example, that you would like to say with regard to this interview or that I can take into account in the future?

Appendix C - Interview guide

Civic integration consultants' policy enactment

Consent form and interview design

- Consent form & explanation of the design of this interview
- - Introduction and background information about the study

Background questions

- Could you briefly introduce yourself?
- What is your current position?
- How long have you been working for municipality X/organisation Y?
- What position did you hold before the introduction of the Integration Act 2021?
- What is your background in terms of studies and work experience?

The Civic Integration Act 2021

- Could you briefly describe the new Civic Integration Act 2021? What are the most important components of the new Civic Integration Act?
- What are the objectives of this new civic integration act?
- What are the main tasks and responsibilities of the municipality/your organisation regarding this new Act?

Customisation

- How does customisation play a role in the provision of the new Integration Act?
- How do you provide customisation?
- To what extent are you able to provide customisation to each client?

Discretion

- Could you describe your duties and powers with regard to the Integration Act?
- To what extent can you take decisions independently?
- How much freedom do you have within your work?
- What does the sanctions policy look like?

Quality of services

- To what extent is municipality X/organisation Y able to successfully implement the Civic Integration Act?

- How satisfied are you with the provided service?

Resources

- How were you prepared for the new Civic Integration Act?
- In case of even questions or uncertainties, where do you find your information?
- Is it possible to make informed decisions? Why (not)?
- How does your caseload affect your services?
- To what extent do you experience stress regarding your work and duties?

Supply and demand

- How has the expansion of your services, or the transition to the new Integration Act, affected your relationship with clients?
- How is it ensured that sufficient time and attention is given to each client?
- How much time do you spend on each client?
- With what kind of questions do persons integrating come to you with?

Expectations

- What expectations does your manager have of you?
- What expectations do colleagues have of you?
- How do you deal with these expectations?

Routine & priorities

- Could you describe your daily activities?
- What do your weekly activities look like? Do they differ from your daily work?
- What do you do when you have too much work on your hands?
- How do you prioritise between clients? And what impact does this have on clients?
- How do you deal with difficult cases and tasks?
- Do you have some success stories? What has been your part in this story?

Closing

- Did the interview meet your expectations?
- Are there things, for example, that you would like to say with regard to this interview or that I can take into account in the future?

Appendix D - Information document

INFORMATIE OVER HET ONDERZOEK

De Wet Inburgering 2021

Introductie

Er is aan u gevraagd om aan dit onderzoek deel te nemen. Meedoen geschiedt op vrijwillige basis. Hiervoor is uw schriftelijke toestemming vereist. U ontvangt tekst en uitleg over de inhoud en opzet van dit onderzoek zodat u een weloverwogen beslissing over uw deelname aan dit onderzoek kunt nemen. Lees deze informatie rustig door. Mocht u naderhand nog vragen hebben dan hoor ik dat uiteraard graag.

Doel van het onderzoek

Sinds januari 2022 is de nieuwe inburgeringswet 2021 in werking getreden. Dit betekent dat inburgering gedecentraliseerd is en de regie bij gemeenten ligt. Gemeenten zijn verantwoordelijk voor het inburgeringsproces van inburgeraars en dienen deze te coördineren. Desalniettemin kunnen gemeenten inburgeringsbeleid op verschillende manieren vormgeven. Niet alleen kunnen gemeenten samenwerken met andere gemeenten, maar ook kunnen bepaalde taken worden uitbesteed, met andere departementen worden gecombineerd enz.

Dit onderzoek is opgezet om meer inzicht in de uitvoering van het nieuwe inburgeringsbeleid op gemeentelijk niveau te verkrijgen. Hierbij wordt de rol van de inburgeringsconsulent, i.e. personen die bij de uitvoering van dit beleid in direct contact met de inburgeraar staan, geanalyseerd. Het doel van het onderzoek is om met behulp van het perspectief van de inburgeringsconsulent te onderzoeken welke factoren (e.g. persoonsgerelateerde alsook werkstructurele) van invloed op hun beleidsuitvoering zijn.

Werkwijze en opbouw

Voor deelname aan dit onderzoek zal een interview worden afgenomen. Dit interview zal uit twee delen bestaan. In het eerste deel van het interview zal kort aandacht aan uw achtergrond besteed worden, terwijl bij het tweede deel vragen over het inburgeringsbeleid en uw rol bij de uitvoering van het inburgeringsbeleid aan bod komen. Hierbij wordt niet per definitie een vaste chronologische volgorde aangehouden. In plaats daarvan zal een semi-gestructureerd interview gehouden worden. Dit betekent dat voorafgaande aan het interview een aantal vragen zijn opgesteld. Afhankelijk van het verloop van het interview, alsook de gegeven antwoorden, kan het zijn dat er extra vragen tijdens het

interview gesteld zullen worden, en daarmee ook van de chronologische structuur afgeweken zal worden. Geen enkel antwoord is goed of fout. Het belangrijkste is dat u zo eerlijk mogelijk antwoord geeft. Indien u zaken niet begrijpt, voelt u zich dan zo vrij om dit te allen tijde aan te geven. Op deze manier kunnen vragen verduidelijkt worden, wat wederom scherpere antwoorden zal opleveren. De verwachting is dat het interview ongeveer een uur in beslag zal nemen.

Vrijwillige deelname

Uw deelname aan dit onderzoek is vrijwillig. Dit betekent dat u uw deelname en toestemming op elk gewenst moment gedurende dit onderzoek kunt intrekken. U hoeft niet aan te geven waarom u wenst te stoppen. Afzien van deelname of stoppen met het interview heeft geen nadelige gevolgen voor u. Tevens kunt u tot twee weken na deelname uw onderzoeksgegevens laten verwijderen. Dit verzoek kunt u indienen door een mail te sturen naar jacqueline.vandervegte@ru.nl.

Vertrouwelijkheid van het onderzoek

Met uw antwoorden en de daarmee verkregen informatie zal vertrouwelijk worden omgegaan. U blijft anoniem en persoonlijke informatie zal niet zomaar met derden gedeeld worden. De uit het interview voortkomende onderzoeksgegevens zullen voor datasets, presentaties en eventuele artikelen gebruikt worden. Deze anoniem gemaakte gegevens zullen tenminste 10 jaar voor andere wetenschappers beschikbaar zijn. Persoonsgegevens die verzameld worden, blijven echter vertrouwelijk. Mochten gegevens uit dit onderzoek met andere wetenschappers gedeeld worden, dan zullen deze gegevens niet tot u herleid kunnen worden.

Voor de afname van het interview wordt de voorkeur gegeven om dit interview op te nemen. Op deze manier kunnen antwoorden getranscribeerd worden. Houdt u er in dat geval rekening mee dat geluidsopnamen omwille van uw stem niet volledig geanonimiseerd kunnen worden. U ontvangt een toestemmingsformulier, waarop u dan wel of niet toestemming voor het maken en gebruiken van geluidsopnamen kunt verlenen. Alle onderzoeksgegevens worden op beveiligde wijze volgens de richtlijnen van de Radboud Universiteit bewaard.

Vragen?

Heeft u nog vragen of wilt u meer informatie over het onderzoek? Dan kunt u contact met mij opnemen via de contactgegevens onderaan deze brief.

Ethische toetsing en klachten

Dit onderzoek is goedgekeurd door de Ethische Toetsingscommissie Geesteswetenschappen van de Radboud Universiteit. Mocht u klachten over dit onderzoek hebben dan kunt u contact met mij

opnemen. Ook kunt u een klacht indienen bij de secretaris van de Ethische Toetsingscommissie Geesteswetenschappen Radboud Universiteit (etc-gw@ru.nl).

Toestemmingsverklaring

Mocht u aan dit onderzoek willen deelnemen dan zou ik u willen vragen de toestemmingsverklaring te ondertekenen. Hiermee verklaart u dat u de verstrekte informatie heeft begrepen, en dat u met deelname aan dit onderzoek instemt.

Met vriendelijke groeten,

Jacqueline van der Vegte

e-mail: jacqueline.vandervegte@ru.nl

Appendix E - List of the documents

Table E1

List of the Documents

Document number	Description	Document Type	Municipality size	Respondent number	Date
1	A Manual guide regarding civic integration and participation	Manual guide	Large Municipality	1 & 12	June 2021
2	Local policy document for the Civic Integration Act 2021	Policy document	Large municipality	14	n.d.
3	Executive plan civic integration	Ordinance	Large municipality	13	n.d.
4	New Civic Integration Act 2021	Policy framework	Medium-sized municipality	4 & 5	November 2020
5	Civic Integration Act 2021 presentation drafted by one of the respondents from the semi-structured	Prezi presentation	Medium-sized municipality	6, 7, & 8	29.03.2023
6	Policy framework civic integration act 2021	Policy framework	Medium sized municipality	9 & 10	14.12.2021
7	Policy regulations	Policy document	Small municipality	12	January 2022

regarding the
Civic Integration
Act 2021

8	School tractories civic integration act	Webpage municipality	Small municipality	2	10.05.2022
9	Webpage civic integration	Webpage municipality	Medium-sized municipality	3	n.d.

N = 9

Appendix F - Code book

On January 1st, 2022, the Dutch Civic Integration Act 2021 came into effect. One of the most significant implications of this new act is the fact that municipalities are now in charge of its enforcement and need to facilitate and coordinate newcomers' civic integration trajectory. To this end, municipalities enjoy a lot of policy freedom. They can decide for themselves whether they want to outsource services, or the complete civic integration trajectory, choose their networking partners and so on (Blankvoort et al., 2023; Government of the Netherlands, n.d.; VNG, 2022a). This study aims to assess which factors influence the policy enactment of civic integration consultants. By focusing on civic integration consultants' policy enactment, the study tries to account for the ways in which institutional and actor-centred factors can influence civic integration consultants' policy enactment in terms of policy interpretations and translations (Scharpf, 1997). Hereby the research relies upon the following research question:

“How do institutional and actor-centred factors influence street-level bureaucrat's policy enactment, i.e. policy interpretation and translation?”

About the coding book

With the help of the research question, this research aims to delve into the inner workings of street-level bureaucrats' policy enactment. Accordingly, this research concentrates on the policy enactment of civic integration consultants tasked with enacting the Dutch Civic Integration Act 2021. It is analysed how institutional and actor-centred factors influence their policy enactment to gain more understanding about street-level bureaucrats' in relation to the efficacy of policy-making.

The structure of the coding book

The coding book is composed by means of combining theories of actor-centred institutionalism (Scharpf, 1997), policy enactment (Ball et al., 2012), and Lipsky's (2010) theory of street-level bureaucracy. The first step in the coding process is coding the source by paying attention to some characteristics of the to-be-codified source. This means that the source is assigned an ID number, and, subsequently, attention is paid to the type of document, its publication date, and whether the source/respondent stems from a large, medium-sized or small municipality, and etc. The second part of the coding process engages with indicators of policy enactment first, followed by the institutional and actor-centred factors.

Column A - ID number

All data will be codified. For this purpose, all sources are assigned their own ID number. This helps to keep an overview regarding the codifications and collected data.

Column B - Times codified

This column will indicate how often a document, interview, or participant observation has been codified.

Column C - Date of publication /date interview held

The date of publication/conducted interview is displayed in the following way: day-month-year. For example, an article which has been published on July 1st, 2023 will be codified as follows: 01.07.2023. For interviews and participant observations, the date at which the event took place will be denoted. Furthermore, if only the month and year are specified, the month is fully written out followed by the year of publication: July 2023. And, if no date is provided, the code “n.d.” is assigned.

Column D - Document type

It is important to indicate what kind of document is codified. By doing so, codes from different sources can be compared to one another which will enhance the reliability of this research in case similar findings are found across different sources. Accordingly, interviews are assigned the number 1.

Code	Source
1	Interview
2	Participant observation
3	Document

Column E - Size of the municipality

This column will assess the size of the municipality from which the source, or information originates. This means that the column will indicate whether the document or respondent stems from a large (8.000 > inhabitants), medium-sized (between 30.000 and 80.0000 inhabitants), or small municipality (< 30.000 inhabitants) (M50, n.d.). Within participant observations though, discussion took place between several representatives and civic integration from different sized municipalities. Accordingly,

all participant observations will obtain the code “0” which indicates a multiplicity of municipalities and civic integration consultants were taking part in the observed meeting.

Code	Size
0	Not applicable
1	Large municipality
2	Medium-sized municipality
3	Small municipality

Column F - Unit of analysis - Actor

With regard to the data, several actors are taken into account. For instance, most documents are general policy statements, indicating that the content is a reflection of a municipality’s point of view rather than a civic integration consultant’s perception of the Civic Integration Act. Accordingly, a division is made between general statements of a municipality about the Civic Integration Act and the tasks of municipalities in general as well as civic integration consultants’ own take on the Civic Integration Act and their work which is most of all considered by means of the conducted interviews. Regarding the participant observations, civic integration consultants and municipalities take part. Both need to be codified separately.

Code	Actor
1	Civic integration consultant
2	Municipality

Column G - Policy interpretation

Civic integration consultants can uphold different policy interpretations. The column touches upon civic integration consultants’ conception of the Civic Integration Act by focusing on described aspects of the acts as well as questions that civic integration consultants might have in relation to the act.

Code	Policy Interpretation	Indicators
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1	General goals and ambitions (broad)	Enhance language and participation, self-sufficiency, economic independence, help to re-integrate and civically integrate, so that they can take care of themselves
2	Process-centred goals (narrow)	Arranging everything well, arranging everything as best as possible for the client, implementing everything as best as possible,
3	General conceptualised features (which are not directly considered part of civic integration consultants' own tasks and responsibilities) (broad)	Social counselling, MAP, PVT, financial unburdening, language lessons, language routes, participation activities, customisation, dual trajectories, family migrants,
4	Civic Integration consultants' perceived tasks (narrow)	Conducting a broad intake, learnability test, conducting a learnability test, drafting a PIP, sanctioning, with the learnability test you try to assess someone's learnability
5	Understanding the act in relation to other acts (broad)	P-wet, participatiewet, previous Civic Integration Act, in relation to the old act, facilitation for Ukrainian refugees
6	Regulations of the Civic Integration Act 2021 (narrow)	Requirement to do the learnability test, to draft a PIP in 10 weeks, 800-hours in the z-route, is that a requirement? Municipality in charge,

municipality responsible for family migrants, learning Dutch at B1 level, complete civic integration within 3 years

Column M - Broad or narrow policy interpretation

Depending upon the amount of narrow or broad policy interpretations which have been mentioned within the previous column(s), it is determined whether a respondent upholds a predominantly broad, in-between or narrow policy interpretations of the Civic Integration Act 2021. If no aspects are mentioned, code “0” is assigned.

Code	Perception	Indicators
0	Not applicable	
1	Narrow conception of the Civic Integration Act	Policy interpretation predominantly overlaps with tasks and responsibilities of the civic integration consultant or mostly with process-related goals or regulations
2	Broad and narrow conception of the Civic Integration Act 2021	Both aspects are considered to be equally important
3	Broad conception of the Civic Integration Act	Policy interpretation mostly does not overlap with the tasks and responsibilities of the civic integration consultant

Column N - Perceived level of discretion

Within this column it is determined to what extent a civic integration consultant enjoys discretionary powers, hereby attention is paid to the degree to which a civic integration consultant can make decisions independently, their perceived level of freedom and the question of whether the civic

integration consultant can impose sanctions (Lipsky, 2010). A low degree of discretion is assigned to civic integration consultants who cannot make decisions independently, experience little freedom and cannot impose sanctions. In contrast, civic integration consultants who can make decisions independently and enjoy a lot of freedom in the course of their jobs, are assigned a medium degree of discretion in case they cannot impose sanctions. Only civic integration consultants who score high in all three dimensions are believed to hold high levels of discretionary powers.

Code	Perceived level of Discretion	Indicators
0	Not indicated	
1	Low Discretion	The civic integration consultant takes on an informative or supportive role towards the newcomer; the respondent cannot sanction and thinks that he or she cannot make decisions independently and does not enjoy a lot of freedom.
2	Medium Discretion	The civic integration consultant can make decisions independently. Sometimes he/she has to negotiate with peers or superiors. The question of whether the civic integration consultant can impose sanctions is, however, unclear or not part and parcel of the perceived tasks and responsibilities of the civic integration consultants.
3	High Discretion	The civic integration consultant enjoys a significant amount of freedom in terms of

decision-making and sanctioning. The civic integration consultant can decide on how to act.

Column O - Perceived level of customisation

The focus lies upon the way in which civic integration consultants believe to provide customisation, hereby customisation can be provided in a wide variety of ways. Not only can civic integration consultants provide customisation in terms of the way they work, i.e. scheduling the appointments at the convenience of clients, scheduling more appointments with clients, and so on, but they can also associate customisation in terms of the services they offer like actively looking for a job within the client desired branch etc. And, depending upon the ways in which customisation is provided a distinction is made between low, medium and high levels of customisation.

A low degree of customisation is assigned to civic integration consultants who argue that they do not think that there are many options to provide customisation, or if they associate customisation solely in relationship to the content of the Civic Integration Act. A medium degree of customisation is assigned to civic integration consultants who indicate that they provide customisation. Customisation is provided in some way by civic integration consultants like the way in which they work and/or the services they offer to clients.

Code	Perceived level of Customisation	Indicators
0	Not indicated	
1	Low Degree of Customisation	The civic integration consultants indicate that there are limited options to provide customisation. Customisation is solely described by referring to the act
2	Medium Degree of	The respondent indicates that

Customisation

he or she provides customisation. Accordingly, some form of customisation is provided by the civic integration consultant. Customisation is provided in the way civic integration consultants work and/or the services they offer to clients.

3

High Degree of Customisation

Customisation is provided in a wide variety of ways by the civic integration consultant. This means that customisation affects the way the civic integration consultant works and the services they offer to clients. They do more than is required.

Column P - Caseload

The amount of clients managed by civic integration consultants is specified. For example, if a client has eighty clients, this will be codified as follows: “80”. No distinction is hereby made within the composition of civic integration consultants’ caseload. Attention is exclusively paid to the total number of clients of civic integration consultants.

Column Q - Caseload influence

Within this column attention is paid to the influence of the caseload on civic integration consultants’ services. In particular, does the size of the caseload influence civic integration consultants’ policy enactment? Hereby a distinction is made between several categories: No influence, positive influence, negative influence, other factors in relation to the caseload. If a client indicates that the number of clients does not affect his work, the code “0” is assigned.

Code	Influence Caseload Size	Indicators
0	Not indicated/No influence/Neutral	Client does not indicate or proclaim that the size of the caseload influence his or her services
1	Positive Influence	The client is still positive about the way in which he or she can provide his services.
2	Negative Influence	Deprives them of time to make decisions or provides customisation. Puts the civic integration consultant under pressure in terms of their policy translation.
3	Other factors in relation to the caseload matter	Frequency of phased influx, composition of the caseload

Column R - Demand meets supply

Within this column, attention is paid to the influence of the hiring practices on civic integration consultants' policy enactment, i.e. policy translation (Lipsky, 2010). If the data demonstrates that a civic integration consultant believes that hiring practices will not influence his or her policy translation a "0" is assigned. If a civic integration consultant believes that this will only lead to a smaller caseload, but does not influence his/her services, the code "1" is assigned.

Code	Demand meets Supply	Indicators
0	Not indicated/Not applicable	No hiring practices
1	No influence	Hiring additional staff will not influence civic integration consultants' policy enactment. The fact that new clients will

		remain part and parcel of a civic integration consultants' caseload makes it likely that the caseload will most
2	Influence on the caseload (quantity)	Hiring additional staff will influence the size of the caseload (in the short run or long run) no clear indication that it will influence the policy enactment of civic integration consultants
3	Improving quality of services	I will have more time to have in-depth interviews with clients
4	Improving quality of services and the caseload (quantity)	The civic integration consultant argues that hiring practices help to reduce the caseload and, thereby, provide them with the opportunity to also able to offer more quality to clients

Column S - Goals & expectations

The focus lies on the extent to which civic integration consultants have to put up with different expectations from superiors and colleagues (Lipsky, 2010). In case a civic integration consultant expresses the difficulty of living up to the expectations of superiors as they might be conflictory with his or her own policy interpretations or translations, the number “3” is assigned.

Code	Goals/Expectations	Indicators
0	Not indicated	
1	No Ambiguous/Conflicting goals and expectations	Respondent is unaware of differences in either goals

		and/or expectations of manager and peers
2	Ambiguous/conflicting goals and expectations expressed by colleagues influence civic integration consultants policy enactment	Colleagues have different expectations or goals in relation to the Civic Integration Act 2021.
3	Ambiguous/conflicting goals and expectations expressed by superiors influence civic integration consultants policy enactment	Superiors have different expectations or goals in relation to the Civic Integration Act 2021. For instance, the expectations to fill systems and keep systems up to date can prevent civic integration consultants from providing customisation
4	Ambiguous/conflicting goals and expectations expressed by colleagues and superiors influence civic integration consultants policy enactment	Both have different expectations from the civic integration consultant in question, distorting his/her policy interpretations and translations

Column T - Preparation

Within this column, it is considered to what degree civic integration consultants were prepared for the new Civic Integration Act. Specific attention is given to the extent to which this preparation influences civic integration consultants' policy interpretations and policy translations, hereby a differentiation is made between no preparation, insufficient preparation, and sufficient preparation (Lipsky, 2010). If, for instance, a civic integration consultant argues that a training did prepare him or her for the new act, the code "3" is assigned.

Code	Preparation	Indicators
0	Not indicated	
1	No preparation	“Ik was niet bij die voorbereiding, die heb ik nooit gevolgd”
2	Insufficient preparation	“Achteraf gezien was dat inhoudelijk genoeg, wat ik gemist heb over de gehele linie is weer die bureaucratie, het was achter de feiten aanlopen”
3	Sufficient preparation	“Op die manier ben ik wel voorbereid, ik denk het wel”

Column U - Experience

Within this column it is considered to what degree civic integration consultants' experience influences their policy enactment. Specific attention is given to the extent to which this experience influences civic integration consultants' policy interpretations and policy translations, hereby a differentiation is made between previous experience do influences policy enactment and previous experiences do influence policy enactment (Ball et al, 2012; Lipsky, 2010). If, for instance, a civic integration consultant believes that he can make decisions based on his/her experience, the code “2” is assigned.

Code	Experience	Indicators
0	Not indicated	
1	Previous experiences do not influence policy enactment	The civic integration consultant does not have any experience and highlights it
2	Experiences influences policy enactment	Je hebt het al eens meegemaakt, waardoor je een ander perspectief hebt; vanaf het eerste gesprek kan ik dat

wel inschatten dat die mensen
meer aandacht nodig hebben

Column V - Time

Lipsky (2010) argues that personal resources such as the amount of time that street-level bureaucrats have at their disposal can influence the way in which they provide services. It is therefore theorised that the amount of time that civic integration consultants have at their disposal can also influence civic integration consultants' policy enactment. Accordingly, this column deals with the perceived amount of time that civic integration consultants have at their disposal and whether, for instance, a lack of time influences their policy interpretations or translations (discretionary powers and degree to which they provide customisation). A clear indicator of such struggles is whether the PIP can be drafted in time, i.e. within the dictated 10 weeks. For instance, if a civic integration consultant does not have enough time to meet deadlines code "1" is assigned.

Code	Time	Indicators
0	Not indicated	
1	Lack of time does not influence policy enactment	PIP not able to draft within 10 weeks; ik heb ook altijd tijd tekort
2	Time influences policy enactment	This is case specific

Column W- Information

Civic integration consultants rely upon different available resources to carry out their tasks. In that regard, it is presumed that (access to) sufficient information influences street-level bureaucrats' decision-making (Lipsky, 2010). Accordingly, this column deals with the influence of information on civic integration consultants' decision-making. If a civic integration consultant argues that there is sufficient information available to carry out tasks, the code "2" is assigned.

Code	Information	Indicators
-------------	--------------------	-------------------

0	Not indicated	
1	Insufficient information	You do not always get answers to your questions; some stuff isn't arranged yet,
2	Sufficient information	Most of the times, yes; there are always places where you can get your information from
3	Case specific	Only in the case of DUO, you can never request information about clients; not receiving reports from COA

Column X - Prioritisation

According to Lipsky (2010), street-level bureaucrats may prioritise between clients or cases in order to stay in control. Accordingly, it is also presumed that such prioritisation may influence the way in which civic integration consultants provide service. This column pays attention to these practices by considering the extent to which civic integration consultants prioritise between clients. If a civic integration consultant, for instance, highlights that all clients are equally important and does not prioritise between them the code "2" is assigned.

Code	Prioritisation	Indicators
0	Not indicated	
1	Prioritisation	The civic integration consultant highlights that he prioritises between clients based on urgency; needs of clients and so on.
2	No prioritisation	The civic integration consultant considers all clients equally important and aims to divide

his or her time equally among them; addresses difficult cases first; “Everything is a priority”

Column Y - Creaming

Prioritisation can also take place in a most particular way. Civic integration consultants may favour some clients based who are likely to succeed anyway, irrespective of their attention and efforts (Lipsky, 2010). If this is the case, creaming is at stake, meaning that the code “1” has to be assigned.

Code	Creaming	Indicators
0	Not indicated	
1	Engages in creaming	prefers to help people who are most likely to succeed
2	Does not engage in creaming	Respondent indicates that all clients are treated with equal care

Column Z - Routines

Street-level bureaucrats resort to practices of routines to maximise the utility of available resources (Lipsky, 2010). Within this column, the focus lies on the extent to which civic integration consultants resort to routines to do their jobs. For this end, a distinction is made between having no routine, some routine, or a strict routines. For instance, if a civic integration consultant postulates that he has some routine in the sense that he or she has a weekly routine, but not a strict way of carrying out tasks, the code “2” is assigned.

Code	Routines	Indicators
0	Not indicated	
1	No routine	Chaotic; routine is not possible; does not have a

		routine
2	Some routine	Weekly routine or some routines, but nothing is set in stone yet
3	Strict routine	The respondent has a routine for carrying out specific tasks
