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The Digitalisation of Dutch Civic Integration: How Digital Technologies Shape Inequality and Bureaucratic Discretion

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Abstract

Migration management is becoming increasingly digitalised, with digital borders producing inequalities by fixing framings that determine who is allowed entry and residence. Civic integration functions as another bordering practice regulating the entry and naturalisation of "migrants." In the Netherlands, the Integration Act 2021 enshrines a partially digitalised civic integration programme, with digital monitoring across government actors, digital language classes and exams, and online communication between "integrators" and "case managers." Nevertheless, how digitalisation shapes the interactions, decisions, and outcomes of civic integration remains unresearched. This qualitative study, based on desk research and in-depth interviews with municipal officers and language teachers, examines the implications of digital technologies in this programme. Our findings reveal a dual impact. For "integrators" with sufficient digital literacy, these technologies offer enhanced language learning and greater self-reliance in a taxing trajectory. However, digital technologies exacerbate existing inequalities and create new forms of digital exclusion for those with limited digital skills, as they impact their performance on their intake test, and therefore their opportunities throughout and after the civic integration trajectory. For street-level bureaucrats, the discretion to potentially mediate these policy effects is not simply curtailed or enabled, but transformed into a "web-level bureaucracy." While digital technologies streamline workflows and quick assessments of a future "integrator," they also impose administrative burdens, introduce bias, and limit bureaucratic discretion. Ultimately, digital civic integration both deepens and narrows existing inequalities and tasks street-level bureaucrats with the responsibility to address pervasive digital divides.

Keywords

civic integration; digitalisation; digital borders; street-level bureaucracy; web-level bureaucracy

1. Introduction

Over the past few decades, migration governance has become increasingly digitalised. In 1990, the Schengen Agreement already provided the basis for large-scale IT systems and information-sharing mechanisms (Brouwer, 2008; Trauttmansdorff, 2017), and by the early 2000s, the European Union had developed surveillance systems such as Eurodac (Broeders, 2007). Scholars have studied this "digital border" by examining how states use databases and algorithms to decide who may enter and stay on their territory (e.g., Achiume, 2021; Brouwer, 2008; Chouliaraki & Georgiou, 2022; Trauttmansdorff, 2017; Zhang & Morris, 2023). During the same period, different European countries started introducing integration requirements for newcomers, with the Netherlands as a forerunner (Joppke, 2017; Kostakopoulou, 2010; Van Oers, 2014). The Dutch civic integration programme encompasses language and civic tuition to "transmit Dutch values" and target newcomers' labour market integration (Entzinger, 2014). The programme is obligatory for people holding a family migrant or an asylum-based residence status, with implications for their residence rights and options for naturalisation. Scholars have therefore increasingly described civic integration as another bordering practice (e.g., Bonjour, 2020; Favell, 2022; Larin, 2020; Onasch, 2020; Schinkel, 2018). Whether viewed as a bordering practice or as a public policy of the welfare state, civic integration also includes digital components.

The Dutch civic integration programme involves digital learning platforms, online communication between municipal officers and integrators, and digital examinations, to name a few. We use the term "integrators" as the literal translation of *inburgeraars* to denote people subjected to the civic integration obligation, and stress that this is merely a bureaucratic label. The use of digital systems by local and central governments to shape and monitor civic integration policy implies that residence rights for newcomers have become hinged on digital skills and access to digital tools. Yet how digitalisation shapes the everyday interactions, decisions, and outcomes of civic integration trajectories has—to our knowledge—not been researched yet. Furthermore, Dutch civic integration is not implemented by a single government institution or actor, but since the coming into force of the new Integration Act 2021, governed across a network of municipal case managers, language schools, central government institutions and organisations. This further complicates how the effects of digitalisation unfold in the Dutch civic integration programme.

To understand how digitalisation affects civic integration, we build on studies from a variety of disciplines and fields, most notably (digital) migration and border studies, public administration scholarship, and civic integration literature, and situate our study at its crossroads. Our focus does not only require attention to scholarship on digital literacy as a threshold for inclusion (e.g., Hansen et al., 2018; Henman, 2022; Nielsen & Hammerslev, 2022) but also warrants attention to the human layers of policy implementation: that of the street-level bureaucrat (e.g., Brodkin, 2012; Lipsky, 2010; Tummers & Bekkers, 2014). Municipal officers and language education providers frequently interact with their clients, and the interaction between street-level discretion and digital infrastructures is key to understanding how digital governance plays out in civic integration. We follow scholars who have adopted Foucault's concept of governmentality to understand the citizen-state interaction within the civic integration arena (e.g., Blankvoort et al., 2023; Löwenheim & Gazit, 2009) and apply the digitalisation lens to understand how this relationship is transformed with digital tools becoming more central in public policy (e.g., Bovens & Zouridis, 2002; Buffat, 2015; Hansen et al., 2018).

In this contribution, we ask what the implications of digital technologies in the Dutch civic integration programme are. Using a qualitative study with municipal officers and language teachers, we (a) map the role of digital technologies in the Dutch civic integration programme, (b) examine the impact of digital technologies on people subjected to a civic integration obligation, and (c) study the implications of digital tools for the discretionary freedom of professionals who are tasked to implement the Dutch Integration Act 2021. In the following, we will present our theoretical framework and our methodological approach, before we move on to our results and a discussion of how digital technologies in Dutch civic integration may mitigate or exacerbate inequalities between "citizen" and "migrant," as well as inequalities among the latter group.

2. Civic Integration as a Digitalised Bordering Practice

2.1. Migration Management & Civic Integration

Scholars have critically approached immigration and integration policies as different manifestations of the same logic: the reaffirmation of national identities (e.g., Darling, 2011; Walters, 2004; Zill et al., 2021). Among others, Schinkel (2018) and Favell (2022) have specifically presented civic integration policy as an extension of immigration policies, as civic integration forms a threshold to full citizenship for those who are allowed residence within nation-states. Several case studies of specific national civic integration programmes have adopted a Foucauldian perspective to argue that civic integration is a one-way process that produces asymmetrical relationships between "immigrants" and the state. For instance, Blankvoort et al. (2023), Hudson et al. (2023), and Löwenheim and Gazit (2009) present civic integration tests as acts that responsibilise the individual integrator, and as technologies of disciplinary power that work to create self-managing citizens. They argue that civic integration functions as a bureaucratic border that newcomers must navigate to access rights, and as such governs who deserves to belong and who does not, along the lines and intersections of race, gender, and class (e.g., Bonjour & Duyvendak, 2018; Hudson et al., 2023; Kirk & Suvarierol, 2014; Kofman, 2023; Kofman et al., 2015; Kostakopoulou, 2010; Larin, 2020; Onasch, 2020). These earlier findings contrast sharply with the official goal of the Integration Act 2021: to offer newcomers a chance to participate in society. Instead, studies of civic integration unveil that people obliged to follow a civic integration trajectory navigate a policy landscape that is producing inequalities between citizens and migrants.

2.2. The Implications of Digitalisation for Migration Management and Public Policy

Needless to say, migration management and public policy are both impacted by digitalisation. ICTs and large-scale digital databases help enact the border through the datafication, categorisation, tracking, and surveillance of people on the move (e.g., Achiume, 2021; Broeders & Dijstelbloem, 2015; Chouliaraki & Georgiou, 2022; McAuliffe, 2021; Trauttmansdorff, 2017). According to McAuliffe (2021), digital borders produce inequalities as their digital nature fixes framings that determine who is allowed entry and residence. An example lies in the use of automated profiling techniques to distinguish "low-risk" from "high-risk" visa applications (McAuliffe, 2021; Rizvi, 2004). Concurrent with the shift from "government" to "governance" in public administration, which takes the multidimensional character of policy systems into account (Hupe & Hill, 2007), digitalisation also impacts the very nature of state governance as ICTs discipline the "implementation of law" (Bovens & Zouridis, 2002) and shape "e-government" (Henman, 2012). Newman

et al. (2022) explain that advanced digital technologies form essential elements in how governments carry out their policies and deliver public services in many countries. Rather than supplementary tools, they are integral to the daily operations of public administration.

The digitalisation of public policy administration produces both positive and negative effects. Digital bureaucratic procedures may benefit users by providing increased convenience and self-service capabilities and allowing access to organisational systems at any time or place. This may enhance information accessibility about entitlements or obligations. From the administrators' perspective, ICTs may streamline their tasks and reduce their workload (Bovens & Zouridis, 2002; Hansen et al., 2018). However, scholars have also argued that the "digital divide" not only reflects but also reinforces existing social inequalities (Scheerder et al., 2017). The divide is commonly described as having three levels: the "first level" concerns unequal access to digital tools; the "second level" involves differences in digital knowledge and skills (Hansen et al., 2018); and the "third level" relates to the unequal outcomes that arise from these disparities. These outcomes are both shaped by and further entrench underlying social factors (Van Deursen & Helsper, 2017; Wei et al., 2011). Research on the first and second levels shows that demographic characteristics such as age, gender, socioeconomic status, ethnicity, and geographic location contribute to differences in digital access and competence (Scheerder et al., 2017). For instance, Hansen et al. (2018) found that being young, male, and Norwegian-born increases the likelihood of ICT use, thereby providing an advantage in interactions with the welfare state. People finding themselves on the disadvantaged side of the divide may instead experience "welfare exits" (Nielsen & Hammerslev, 2022) or "algorithmic disentitlement" (Henman, 2022). Linos et al. (2022), for instance, studied disadvantaged communities' access to free meals through communication technologies and found that technological shifts increase the "administrative burden" for high-need communities due to psychological and technical causes.

2.3. Civic Integration, Digitalisation, and Street-Level Bureaucracy

Digital technologies of bureaucracy also affect civic integration policy. In the Netherlands, integrators are faced with digital language and civic tuition, digital examinations, and virtual contact with their case managers, and their data are stored in client management systems. Following Schou and Pors (2019) and Hansen et al. (2018), digital technologies may further stratify the already uneven terrain of civic integration, which will eventually affect one's residence status or eligibility for citizenship. As civic integration co-determines access to rights and opportunities, it constitutes another bordering practice (e.g., Achiume, 2021; Broeders, 2007; Broeders & Dijstelbloem, 2015; Chouliaraki & Georgiou, 2019, 2022; Henman, 2012, 2022; Larkin, 2013) that is administered with digital technologies.

The "state-citizen interaction" (Bovens & Zouridis, 2002; Hansen et al., 2018; Kvakic & Larsson, 2024; Nielsen & Hammerslev, 2022; Schou & Pors, 2019; Van Toorn et al., 2024) in Dutch civic integration takes place across different levels of government, NGOs, and other organisations. Municipal officers and civic integration teachers together form the street-level bureaucrats (SLBs; Lipsky, 2010) who form the human layer between the central government and the individual integrator. Lipsky's (2010) street-level bureaucracy theory defines SLBs as public service workers who interact directly with citizens and exercise discretion in the execution of public policy. Scholars (e.g., Brodkin, 2012; Hupe & Hill, 2007) have extended this definition to include contracted actors who carry out public work. Both municipal case managers and civic integration teachers interact with their clients on a regular basis, monitor their progress and make decisions

based on the progress made, and report to other actors. "Discretion," "discretionary freedom," and "discretionary power" refer to the ability of SLBs to make choices about how public policy is delivered—i.e., how rules of a policy framework are interpreted, applied, and, if needed, bent to the diverse situations of individual people (e.g., Brodkin, 2012; Tummers & Bekkers, 2014). While a key concern with discretionary power is that it may result in unpredictable and inconsistent administrative decisions, discretion may also help provide appropriate services for the circumstances of the client (Bovens & Zouridis, 2002; Tummers & Bekkers, 2014).

In turn, SLBs' discretion may be impacted by the digitalisation of civic integration. Bovens and Zouridis (2002) argued that digitalisation turns street-level bureaucracies into "screen-level" and "system-level" bureaucracies, in which increased use of ICTs and limited face-to-face interactions lead to less discretionary power and therefore less arbitrariness in the exercise of power. This is called the "curtailment hypothesis." However, the pursuit of this "perfect legality" may spur "digital rigidity," or a blind application of the law that undermines achieving justice in every particular case (Bovens & Zouridis, 2002). The curtailment hypothesis is juxtaposed by the "enabling thesis," which proposes that SLBs can use technologies as resources and still apply their judgment (Buffat, 2015). In their study on Norwegian child welfare services, Kvakic and Larsson (2024) argue that digitalisation invokes "web-level bureaucracy" in which discretion does not disappear, but takes a different form as public service workers are more available to clients, and may use clients' digital footprints to inform their discretionary judgment. At the same time, Kvakic and Larsson argue that the shift to web-level bureaucracy may relocate discretion from frontline staff to IT workers who define underlying algorithms that could create systemic biases.

In sum, civic integration has earlier been conceptualised as a space of power and control, and digital tools shape that power in material and bureaucratic ways. Those dynamics are embodied and negotiated in the everyday practices of the SLBs that implement civic integration policy. In our results section, we will present findings on how digital technologies shape a civic integration trajectory directly and show how SLBs interact with those technologies by resisting, changing, or amplifying their effects.

3. Methodology

We first conducted desk research to map the role of digital technologies in the Integration Act 2021. The documents we analysed concern parliamentary documents that have been published prior to the adoption of the new act, as well as guidelines for case workers produced by Divosa, an organisation tasked with supporting municipalities to take on their new role under the Integration Act 2021.

As we wished to study the real-world implementations and implications of civic integration policy, we have opted for a qualitative study design (Beuving & De Vries, 2015). Our target research population initially included municipal case managers, civic integration language teachers, and integrators. We invited municipal case managers as they hold the most comprehensive overview of the entire civic integration trajectory. Language teachers are the SLBs responsible for the civic integration programme's key activity: language classes. Finally, people with an integration obligation could share key lived experiences of navigating the civic integration programme. We approached our potential interlocutors through snowball sampling, with an email that described the focus of our study and practical information on participation. Eventually, while having held some interviews with integrators, we consciously decided to focus solely on municipal case

managers and language teachers. While the perspectives of integrators themselves are of key value to the topic, we chose to refrain from elaborate fieldwork with this group. Given their still precarious legal status and the currently dominant political hostility against "migrants," this research should be considered "sensitive" (Lee, 1993) and including interlocutors then warrants a particularly careful approach. In addition, people staying in the Netherlands on an asylum-based permit have already been overburdened with similar requests from researchers. These factors led us to shift our focus and eventually underpin this article with twenty-five qualitative interviews with twenty municipal case managers and five language teachers. While these SLBs cannot share lived experiences of the civic integration obligation, they did share valuable information based on their daily interactions with their clients. We therefore believe that this exploratory study still yields valuable insights into how digitalised civic integration policy is implemented on the ground, and which important implications arise for integrators.

Both authors contributed equally to the fieldwork. As researchers working on the Dutch civic integration system, we both occupy positions in the institutional context in which the interlocutors work. As interlocutors were invited through our professional networks, they may have felt a sense of obligation to participate. However, given the absence of significant power imbalances, we believe they were free to decline participation. While we have previously written critically about civic integration, the far larger part of the interlocutors was unfamiliar with our work, and their responses reflected a broad range of perspectives.

We held semi-structured interviews to align our work and to make sure our interviews touched upon all the topics relevant to the study. The semi-structured design left space for other topics to emerge during the conversations (Beuving & De Vries, 2015). With the case managers, we posed questions on the role of digital technologies in the programme's different elements—including the intake, the tuition, the communication between integrators and case managers, and the way civic integration is being monitored. From there, we moved on to their perceptions of integrators' digital skills, and the advantages and pitfalls of digital civic integration for the outcomes of their civic integration trajectories, as well as available support, such as digital skills training. With the language teachers, we zoomed in on their courses' digital elements, their monitoring practices, their intake testing, and their experiences with digital learning modes in the classroom. The interviews lasted between half an hour and two hours, with an average duration of one hour and fifteen minutes. Fifteen out of twenty-five interviews were held via Microsoft Teams and ten took place at an offline location of the interlocutors' preference. While online interview settings do not allow researchers to build much rapport, all interlocutors seemed at ease with the format and open to talking freely and elaborately. All interviews were held in Dutch. We used audio, video, and transcription tools to record the interviews.

We analysed the data with qualitative data analysis software ATLAS.ti and used thematic coding in both a deductive and an inductive way. This allowed us to code according to the interview guide we had prepared and to the topics that emerged during the interviews, and thus to develop themes out of the interlocutors' interpretative stories (see also Braun & Clarke, 2023). In our analysis, we first applied open codes before thematically grouping them into axial codes (Friese, 2019). Both researchers contributed equally to the coding process and collaborated in the Web version of ATLAS.ti by sharing and describing codes. We also held regular meetings to discuss their meanings and ensure intercoder reliability. We paid attention to the relational dynamics of the different interlocutors, as they occasionally worked in the same municipality and shared their perspectives on the collaborations between their language schools and local governments. We therefore refrain from sharing the interlocutors' background characteristics and only use

pseudonyms to accompany their quotes. Given the close connections between these policy officers and considering the current political climate on matters of asylum, we took these precautions to prevent our interlocutors' identification.

4. Results

We will present our results in three sections. The first section is primarily descriptive and provides the inventory of the role of digital technology in civic integration as found through our desk research and as explained by the interlocutors as they reflected on their work processes. The second and third sections are more analytical and highlight the direct (potential) implications of digitalisation for people in civic integration trajectories and the implications for the bureaucratic discretion of civic integration case managers and language teachers. Each section encompasses subsections that present themes directly derived from the data, illustrated with verbatim quotes.

4.1. The Dutch Civic Integration Programme and the Role of Digital Technologies

The current Dutch civic integration programme is enshrined in the Integration Act 2021. This act obliges people with a family migrant or an asylum-based residence status to comply with an integration obligation, which in most cases includes passing an examination within three years of the starting date. During these years, people follow courses to prepare for their examination. The examination generally consists of four Dutch language proficiency tests at the B1-level of the Council of Europe's Common European Framework of Reference for Languages (CEF). It also includes an examination called Knowledge of Dutch Society (KNM) and a final interview for the Module Labour Market Participation (MAP).

4.1.1. Assigning People to One of Three "Civic Integration Routes"

People can fulfil their integration obligation by following one of three "learning routes." All routes aim to achieve the goal of "integration": participation in Dutch society, preferably via paid work (Second Chamber, 2020). The different routes have officially been designed to suit people's different skills, needs, and wishes for their "integration." The routes include (a) the "B1-route," focused on labour market participation and B1 Dutch language proficiency; (b) the *Onderwijsroute* or "education route" with a focus on B1 or B2 Dutch proficiency and continuing education, ranging from vocational training, to higher professional education and university studies; and (c) the Z-route or "self-sufficiency route" for whom the B1-route is considered unsuitable. The Z-route was designed for those who "have had little or no education in their country of origin before coming to the Netherlands, have low learning ability and/or are having great difficulty learning the Dutch language" (Second Chamber, 2020). The Z-route does not require passing an exam, but requires those assigned to it to follow 800 hours of language tuition. Integrators with an asylum status will additionally have to follow 800 "participation" hours. The act offers the possibility to switch between learning routes, as well as to "scale down" the level of language proficiency in the B1-route to A2. Since naturalisation depends on passing a Dutch language exam at level A2, individuals in the Z-route, although required to "integrate," may only be able to acquire Dutch nationality if they are exempted from taking the integration examination. Our interlocutors noted that not everyone placed on this route is informed of this consequence.

Most integrators are in the B1-route (70% of all integrators on 1 June 2025), followed by the Z-route (23%; Second Chamber, 2025). Most participants in the Z-route (almost 90%) hold an asylum-based residence status. Forty-five percent of integrators following the B1-route are "scaled down" to level A2 (Significant, 2025, p. 43). On 1 June 2025, three and a half years after the entry into force of the Integration Act 2021, a total of 111.639 people had been confronted with an integration obligation (Second Chamber, 2025). On that date, 10.710 of these integrators no longer fell under the scope of the Integration Act 2021. Only a third of these former integrators had complied with their integration obligation under the Integration Act 2021. The rest had either received dispensation (41%), had been exempt (2%), or their integration obligation had ended for other reasons, for instance, because their residence permit had been withdrawn (24%; Second Chamber, 2025).

To determine the most suitable route, every integrator is assigned a municipal case manager, who maps the person's educational attainment, work experience, family situation, aspirations, and more, during the "Broad Intake." Central to this intake is the learnability test. This digital test is distributed by the central government agency responsible for administering civic integration at the central level. This agency is called Dienst Uitvoering Onderwijs (DUO). DUO monitors integrators' progress and imposes sanctions if people fail to meet their obligations on time. Our interlocutors explained that DUO presents the learnability test as a neutral tool to assess a person's capability to learn Dutch. The test results are processed by DUO and made available to the case manager through DUO's online portal. In most cases, the route seems to be determined by both the result of the learnability test and the other information gathered during the broad intake. The case manager enters the information gained during the broad intake into a digital dossier and draws a personal integration plan (PIP), including, inter alia, the chosen learning route, and submits it to DUO's portal.

4.1.2. Tuition and Examination

Once the PIP has been determined, the three-year integration period starts. We interviewed people working at two different national language course providers and several local providers. All providers in our sample use classical teaching methods with physical books, as well as online assignments. The course provider or municipality distributes laptops so that students can access their study materials during class and while doing homework. One provider puts more emphasis on digital teaching methods, with a large part of teaching hours spent on digital exercises and independent learning, while the teachers provide on-site individual guidance. Other courses that people must complete in their civic integration trajectory include the KNM examination, the participation declaration trajectory (PVT) to adopt "Dutch values," and the MAP. For the KNM, the course providers adopt a similarly dual analogous/digital learning approach, but the other programmes—not offered by the language course providers—mostly take practical non-digital formats such as workshops and internships. The Dutch language and KNM exams have a digital multiple-choice format and take place at a DUO office location. While the language institution is responsible for providing education, DUO is thus responsible for testing whether the language requirements and the KNM requirements have been met.

4.1.3. Monitoring and Documentation Practices

To monitor integrators' progress throughout their civic integration trajectories, the language teachers track their students' attendance and language attainment through digital logs and send those logs to municipal case managers. These data sharing practices are subjected to the GDPR. For most schools, these logs are

complemented with direct and regular communication about the integrators' progress in class. The case manager and integrator meet several times per year, depending on the case managers' work pressure and the integrators' circumstances. Their communication in between these meetings mostly takes place via WhatsApp. Case managers enter detailed progress updates in their digital client management systems while they submit key points of progress to the DUO portal. These include the passing of the different exams as well as fulfilling the MAP. Integrators can log in to the My Civic Integration area in the DUO portal as well to view their exam results, official letters from DUO, and the start and end dates of their civic integration term. If the integrator fails to attend obligatory meetings with their case manager or fails to attend 80% of their classes fines apply that can be issued at the discretion of the case manager.

4.2. The Potential Implications of Digital Civic Integration for Integrators

Drawing on their overview of the civic integration programme and their experience managing large numbers of client portfolios, the interlocutors offered a solid foundation for identifying potential benefits and challenges of digital civic integration, which we discuss in this section.

4.2.1. Opportunities From Digital Learning

The language teachers explained that, for people with sufficient digital skills, digital technologies could significantly spur their language learning process, as there is "a wealth" of complementary online learning materials and exercises that enable people to learn the language faster. One teacher explained that automated exercises are particularly beneficial for improving pronunciation and listening skills. Some language teachers disclosed that language schools today often lack the human resources to provide separate classes for different (sub)levels among their students. Under these circumstances, studying individually behind a laptop, while still in the classroom, gives students space to keep making progress at their own level. For instance, some people still need to adopt the Latin alphabet. Digital programmes have been designed to help them do so. One teacher mentioned providing a digital literacy module in her mixed-level class. She argued that the module supports both illiterate learners and those literate in a non-Latin alphabet, as it helps them adopt the Latin script through visuals and sounds that reinforce sound-sign connections:

> We have a methodology that is also mostly online. Because then one can independently occupy one part of the lesson, as the teacher does not have time to help everybody at once. (Ingrid, language teacher and coordinator)

These benefits extend beyond the classroom. Some case managers and language teachers disclosed that digital civic integration courses fit the overall level of digitalisation of Dutch bureaucratic systems and reasoned that these courses thus prepare students for navigating those systems independently:

> The Netherlands is all digital, so that is only useful. If you just learn that right now, so to speak. (Ingrid, language teacher and coordinator)

One interlocutor shared that the DUO portal empowers integrators because it allows them to check their own trajectory's progress online, which fosters their self-reliance and personal responsibility for their trajectory:

> Ultimately, it is great that people have access to their own integration file. Viewing, being able to apply for exams, so that gives independence and responsibility. (Michelle, case manager)

Another advantage of the use of digital technologies is the easier and more informal communication between the case manager and the integrator. The use of digital communication tools like WhatsApp allows integrators to request information more frequently, and, with the help of Google Translate, in their preferred language. Some mentioned that this leads to both an "enhanced sense of trust in institutions" but also transfers responsibility from the case manager to the integrator, to reach out in case one needs assistance.

4.2.2. Challenges and Constraints

At the same time, the digital aspects of the Dutch civic integration programme ignite some key concerns among the interlocutors. First and foremost, digital skills directly influence people's performance on the learnability test. This digital and visual test asks the integrator to drag and drop pictures with a mouse or a mousepad. Some interlocutors shared how people with no to limited experience with computers struggle to perform in this test, while that does not necessarily mean that these people have no language learning potential. One language teacher, for instance, explained that this test may, at least theoretically, have a great impact on people's future:

> The DUO learnability test is digital, and then you filter out the people who are digitally skilled. What municipalities do…when the Z-route comes out of the DUO test, they ask us to take a good look. Because sometimes they are young people, and you really don't want them in the Z-route. Because yes, that's where you actually determine their future, and you really just have to see if they fit into a B1-route with literacy training. That's where the learnability test often produces incorrect diagnoses. (Ingrid, language teacher and coordinator)

Beyond limited options to obtain Dutch citizenship, the Z-route does not offer the same opportunities as the B1-route does in terms of language proficiency, which naturally affects all sorts of opportunities after the civic integration trajectory. More than a direct impact, a lack of digital skills results in (additional) nervousness for this test, which may also negatively affect the outcome:

> You can of course just get a lot of stress from that to start with. Yes, then if you are stressed, it can be that just because of that stress you are doing less well. (Michelle, case manager)

Many case managers contextualise the impact of the learnability test by pointing to other factors weighing in on their final decision, and the option to scale up or down if a learning route turns out to be unsuitable after all. We will return to the implications of the learnability test later.

Another concern is that people with limited experience with digital devices also have limited ability to complete their digital homework or engage with online learning environments:

> Well, I have two ladies. They can't turn on their own Chrome books. They can't switch from one programme to another, one can still work a little bit with the mouse, but my other student can't even do that. (Lieke, language teacher)

The digital mode of literacy training thus only works if learners are digitally literate. Teachers often mentioned that they spend a lot of time in class teaching digital literacy, which lies beyond their tasks as language teachers. They would prefer that such training happen prior to the civic integration trajectory. These same problems hold for some of the teachers, who also indicate to not fully master the devices they are supposed to operate in class (see also below in Section 4.3.4). Beyond these practical challenges, one interlocutor mentioned that digital language training misses the point:

> You don't learn to apply it in a daily real situation with another person. Language is naturally primarily intended to connect with each other and to have a conversation. (Elsa, language teacher)

Another case manager explained that students seem much less engaged in digital language classes and often skip class as a result, leading to dwindling attendance rates of extremes down to twenty percent. This could, in her eyes, for a large part be explained by the digital nature of the course.

4.2.3. Inequities Among Groups

Our interlocutors noted that certain groups appear disproportionately affected by the digital divide. In their view, older people, those with limited education, individuals who have mainly done physical work, people who are illiterate in their native language, those from rural areas, and women tend to have had less access to digital devices and, consequently, fewer digital skills. In this vein, Lieke, a language teacher, conveyed:

> Particularly women who come from rural areas and have had hardly any schooling. In their home country, they have only carried out household tasks, and their household may also not have had the means to purchase digital equipment. In some countries, digital equipment is also prohibited. In addition, there are also men who, from a young age, did physical work without education or had to enter the army at an early age. These men also often have minimal to no digital skills.

Although some interlocutors reasoned that digitalisation promotes self-reliance and equality through enabling self-study and independent information retrieval from the web or from case managers, others argued that the civic integration policy arena should incorporate digital skills training before the official civic integration term starts. This would help "level the playing field" and give people with varying digital skills more equal opportunities. Although Dutch libraries are mandated to offer digital skills training, language teachers particularly emphasised that these programmes often fail to address the specific digital skills required for civic integration and that libraries are not always logistically accessible. Moreover, these trainings target everybody who would like to work on their digital skills and are given by Dutch-speaking (volunteer) instructors, which may form another threshold for people still learning Dutch. One language school, therefore, developed its own digital skills training, but that particular school does not use a predominantly digital learning programme.

4.3. The Implications of Digital Technologies for the Discretion of SLBs

4.3.1. Ticking Boxes Versus Case Managers' Tailored Support

The results of the learnability test, the start and end date of the civic integration trajectory, and the completion of the different compulsory components—the language and KNM exams, the MAP, and the

PVT—are all boxes the case manager needs to tick in the DUO portal. In the eyes of some interlocutors, this standardised approach imposes a narrow focus on what integration means and reduces case managers' space to adopt a more holistic as well as a more individualised approach that caters to each person's specific and full range of needs for their "integration":

> In our work, integration is very much about "do you meet the integration obligation?"...that is really about a language level, what someone achieves and a number of other obligations that someone completes....I prefer a more integral approach. (Marije, case manager)

In a similar vein, another case manager shared that:

> I would actually like to offer a bit more customisation in some situations. I'm always looking...where is my space to look at what's needed? What works instead of what absolutely has to be done? (Eline, case manager)

However, when one interlocutor tried to apply "what works" and wanted to exempt an integrator from the MAP element, she could mark the MAP as completed without consequences. There was no check-up on this element. For the exams, this would not be possible, as they are administered centrally by DUO itself.

4.3.2. The Learnability Test and Case Manager Judgment

While the learnability test was developed as a standardised tool to assess people's "learnability" objectively, and to subsequently sort people into the different learning routes based on their score, this test does not prevent case managers from making their mark on people's opportunities in the Netherlands. As a matter of fact, none of the interviewed case managers conveyed to follow the test results without weighing in the person's background, which they sketch during the broad intake. Instead, most described the test as a confirmatory factor after they had already assessed the integrator's starting position with questions. Some stressed how they follow their personal judgment:

> I really do have something like a *Fingerspitzengefühl* [loosely translatable as a "finetuned instinct"] that helps me to deviate from the information that does or does not qualify a person for a certain route. (Jeanine, case manager)

Furthermore, the case manager often decides in consultation with the language provider, who uses intake testing to determine the most fitting language level. To mediate the effects of digital skills on the test outcome, one municipality provides training opportunities specifically for the learnability test, and some provide practical assistance during this test. However, these support measures depend on the availability of staff, as well as on the personal considerations of the case manager. One case manager explained that her team needed to hold the learnability test in small groups due to their staff shortage. Some case managers found the test redundant and harmful for people who have failed the test and whose case gives no indication that learning Dutch on more than a basic level is feasible for them. The idea that the test is a redundant element also emerged in the case of integrators who are obviously able to follow the B1-route, such as those who have completed high levels of education. In both cases, people needed to take a test, while the case manager already found the outcome evident before the test was taken. Case managers would like the option to skip over the test, but DUO requires the test to be completed.

While these examples show that case managers still hold discretionary power to choose differently from what the test prescribes, one interlocutor mentioned that some of her colleagues follow legal provisions to the letter, while others give precedence to the law's intended goals. By making this statement, this interlocutor respectively touched upon the difference between "legalism" and "unauthorised discretion" from Kagan's classical typology of rule application (Kagan, 1978). While the case managers' discretion may not necessarily be confined by the learnability test, those SLBs applying a legalistic mode of rule application will follow the test's outcome more closely.

4.3.3. Tracking People Through Client Management Systems

To sketch the background of the integrators with an asylum status prior to their first meeting with them, case managers conveyed to retrieve information from TVS, the client management system operated by Centraal Orgaan Opvang Asielzoekers (COA). COA is the government agency responsible for the reception of people applying for asylum in the Netherlands. While the interlocutors explained that they do not have access to sensitive information used for people's asylum claims, TVS does shed light on the person's life circumstances:

> I check the information in their system. Whether someone has actually been to school, what someone intends to do in the Netherlands, [or whether] the[ir] family reunification [is] going on? But also the current situation. (Daan, case manager)

Though not a direct effect of digital data storage, the easy access of this information shapes a first filter in the decision-making process of the case manager, which may go further than what people themselves would present during their intake conversations.

The sharing of data further along the civic integration process, between colleagues of the same team and between the language school and the municipality, is meant to create a level of inter-colleague transparency for different purposes:

> We have our own system….We have set up all kinds of work processes in it: reporting, decisions, invitations, PIPs, fining processes, the progress of the hours in the Z-route, and a kind of overview list in which we have combined the data from DUO and the data from TVS. So that you can see who has to do civic integration. Who started when, who still has to start, and who is waiting for a house. So that we don't miss anyone. (Mira, case manager)

Data are thus stored by one bureaucrat and shared with another. These record-keeping processes differ per municipality and language school. As for the language schools, the files contain information about civic integration starting dates, the courses and exams taken, presence during class, and expected end dates of civic integration. These files are shared with municipal officers. Information may also be shared via e-mail, for instance, in special circumstances that warrant communication between the language teacher and municipal case manager. Eventually, municipalities mark the different completed parts of civic integration in the DUO portal.

While the administration helps DUO to keep civic integration in check, and may serve the case managers' work processes, client management systems may impose an "administrative burden" that actually reduces the

time the case manager has left for face-to-face support. Though this may largely be an issue of bureaucracy more than solely a digital effect, some interlocutors conveyed how their internal client management system is not "up and running" and is currently causing a duplication of work.

4.3.4. Digital Tools and Teachers' Discretion

Digital technologies also affect the teachers' discretionary power. They may enrich teachers' toolkits to help their students meet the requirements of the Integration Act 2021. However, in some schools, teachers are mandated to provide their lessons on digital devices, while those mandates may not always match their own or their students' digital skills. Issues such as problems with logging in to an online learning environment or issues with the provided hardware often disrupt the classes. Especially for some students in the Z-route, who more often seem to have limited digital literacy and specific learning needs, digital classes present a hurdle. This shows that digital teaching methods do not enable all individuals to "keep making progress" at their individual level. Some teachers stressed the need for a class assistant who has the specific task to troubleshoot practical issues, so that assistance with technology does not detract time from the language tuition itself. To foster more engagement in class, some teachers supplement their mostly digital classes with physical materials, group activities, and outings. This helps their students to learn in a more immersive way:

> Are you familiar with the total physical response [TPR]? This is especially important in the Z-route. The idea with TPR is that you stimulate all the senses, because that is how you remember something best. So I bring things to class, and sometimes I take the students to the supermarket to show things. (Lieke, language teacher)

Both examples show that the teachers demonstrate proactive responses to a more systemic problem, as well as the limits of their options.

Another issue lies in the monitoring of the students' progress. While teachers keep track of student attendance and progress in digital logs, some schools have decided to restrict further communication between the teachers and the municipal case managers. In case of issues with student progress, neither the teacher nor the case manager can discuss the problem with their colleague:

> If I want to make it clear to the municipality that things are not going well, then I can only do that via the project planners. And if I do that, I don't get any feedback. So this could still be improved. (Lieke, language teacher)

Due to the heavy workload of both teachers and these intermediaries, interventions to assist a person are delayed or not happening at all. In that sense, there is a confining effect of the digital nature of current monitoring practices on these SLBs' discretionary freedom.

5. Discussion

In line with Schou and Pors (2019), our interviews suggest that digital components of civic integration may reinforce existing social hierarchies and create new forms of exclusion. Case managers, who supervise the learnability test, indicated that people with limited digital skills may perform poorly on this digital test and

may therefore unjustly be placed in the Z-route. Such misplacement has significant consequences for their ability to obtain full citizenship and for their broader opportunities in Dutch society. Furthermore, language teachers explained that students may struggle with digital formats in their language courses. Those findings illustrate how the "second level" of the digital divide (Hansen et al., 2018) may impede people's civic integration success. As the language teachers reflected on differences between groups of students, their responses hint at deeper inequalities along lines of age, class, gender, and region of origin, because digital literacy seems to be unevenly distributed across demographic groups. This is "the social divide" compounding the digital divide (Hansen et al., 2018) in the Dutch civic integration arena. Nevertheless, we also found that digital teaching methods, easier access to case managers, and digital information retrieval may also support integrators to meet their obligations, provided their digital skills are sufficiently developed (second level) and the necessary devices are available and functional (first level). Our study thus reveals that digital civic integration components affect integration outcomes both negatively and positively, by respectively reinforcing and diminishing social inequalities. The third level of the digital divide is thereby simultaneously deepened and narrowed.

We also aimed to understand how SLBs in civic integration may find their discretionary freedom impacted by digital technologies. We found some evidence for the curtailment hypothesis (see Bovens & Zouridis, 2002), as well as for the enabling thesis (see Buffat, 2015). Yet we mostly found that discretion takes a different shape in the digital age, perhaps best fitting Kvakic and Larsson's (2024) notion of "web-level bureaucracy." As in the study of Kvakic and Larsson, digital technology implies that the discretionary power of the SLBs in civic integration is transformed, in both enabling and curtailing ways. Our study empirically specifies this in different ways:

As for the curtailment thesis, the standardised approach to civic integration, implemented by the central government and monitored by DUO, imposes some limits on case managers' discretion. It does not facilitate thinking beyond DUO's "tick-box monitoring." In other words, it proposes a narrow view of integration and what an individual may need in the process. Several interlocutors expressed a preference for focusing on "what works" over simply complying with "what needs to be done." This emphasis on procedural efficiency was evident in the limited communication between language schools and municipalities, where digital monitoring was considered sufficient by the schools. Such reliance on digital systems restricted more personalised and tailored forms of support. The clearest example of this constraint emerged in discussions about the compulsory learnability test. Some SLBs reported that they would have preferred to skip the test altogether in cases where the outcome of the test and the resulting learning route is already evident to them. However, the test does not eliminate discretion: SLBs can still override its results based on the Broad Intake and the language school's assessment. When possible, case managers may help individuals prepare for the test or guide them through it, if they think this is in line with their own professional role. We view the discretionary power of case managers less in light of the concerns paired with the arbitrary implementation of the law, given the high demands of the Integration Act 2021.

As for the enabling thesis, case managers occasionally use digital technology to their advantage. Client management systems can streamline their workflow, and the constant availability among as well as between SLBs and integrators allows case managers to respond to their clients' individual needs. Moreover, digital information from the TVS system is sometimes leveraged to inform their picture of an integrator. This echoes findings from Kvakic and Larsson (2024), who show how SLBs use their clients' digital footprints to exert discretion. However, the use of digitally shared information, such as that from COA, can be

double-edged. While it may enhance SLBs' discretionary power by enabling early insight into their prospective client, it also risks introducing bias by taking in second-hand information about a person's prior life situation before they meet them. In that sense, digital information may not really enable their discretion, as the individual is no longer perceived independently of their digitally stored profile that was created by another SLB, working in another digital monitoring system.

For language teachers, digital tools can offer a form of enhanced control as they allow them to more flexibly divide their attention between students in the classroom. However, that potential is at times undermined by practical limitations: technical issues and uneven digital literacy among students can slow down students' progress by reducing the quality of the instruction they receive. Moreover, the limited digital skills of some of the SLBs may unintentionally limit the integrators' space for progress when the teaching requirements rely on digital technologies. The findings seem to unveil that both integrators and SLBs are treated as "digital by default" (Schou & Pors, 2019) and may both suffer from an "administrative burden" as they respectively try to comply with or implement civic integration policy. Still, teachers demonstrate proactive responses to these issues and find the power to exert discretion through more immersive language classes by tapping into other, non-digital sources. Integrators will do this too, but our data do not provide the means to delve into this topic.

6. Conclusion

Digital technologies are woven into the entire Dutch civic integration programme, and this both reinforces and diminishes inequalities. Digital technologies offer opportunities for enhanced language learning and greater self-reliance in a taxing trajectory for those with sufficient digital literacy, by providing access to complementary online materials and enabling direct online communication with case managers. Yet digital civic integration impacts newcomers unevenly. Digital technologies tend to exacerbate existing social inequalities and create new forms of digital exclusion, particularly for people with limited digital skills, as they are sorted out by the learnability test and confined on their way to stronger residence and Dutch citizenship. Digital teaching methods may not facilitate the social aspects of practising a language and do not suit everybody's learning style or capabilities, which leads to less engagement in the classroom and eventually less progress in their proficiency. It is therefore crucial that individuals with limited digital skills are given the opportunity at the outset of the civic integration process to develop these competencies in an accessible and supportive manner.

For SLBs, including case managers and language teachers, the shift to a web-level bureaucracy (Kvakic & Larsson, 2024) means their discretionary power is neither strictly curtailed nor simply enabled, but notably transformed. Digital systems have indeed opened new avenues for communication with clients, ways to streamline workflows, possibilities to provide early insights into integrators' backgrounds through shared data, and facilitated data sharing for monitoring practices, all of which do not directly seem to impact the level of discretion. However, they can also impose administrative burdens, introduce bias through pre-existing digital profiles, and restrict the flexibility of the case manager or language teachers, while an individual's situation may warrant a tailored approach from them. Our study thus showed that the "web-level bureaucracy" in which the case managers in our study operate may actually negatively impact their level of discretion more covertly.

Ultimately, as civic integration itself becomes "digital by default," it not only streamlines administrative processes but critically redefines who belongs and on what terms. The digital border that is civic integration tasks the street-level bureaucrat with nuanced policy responses on the ground that actively address these pervasive digital and social divides.

While this study sheds light on digital civic integration, some key questions remain. Future research should, for instance, consider integrators' experiences and examine data-sharing practices between language schools, case managers, and COA to identify privacy risks. We plan to address these gaps in our forthcoming research to provide a more complete understanding of how digitalisation shapes civic integration outcomes.

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