
IMA

For the Citizens'
Rights Agreements

Annual Plan 2021/22



Contents

Joint Foreword by the Chair and Interim Chief Executive	5
Who We Are	6
What We Do	7
Why We Do it	9
How We Deliver	10
Milestones	16



**We want to put
upholding citizens'
rights at the heart of
UK public bodies' work.**

Joint Foreword

by the Chair and Interim Chief Executive

This promises to be an important period for the IMA as we enter the first full year of our operation.

We were established in 2020, going live at 11pm on December 31st with a clear vision that we are here to make sure that EU and EEA EFTA citizens living in the UK and in Gibraltar enjoy the same rights as they did before the UK left the EU.



There will be challenges ahead but we know that our work will make a difference to the lives of many people and upholds the important intent of the Withdrawal Agreement.



Our mission is clear, we want to put upholding citizens' rights at the heart of UK public bodies' work. To do this we will work constructively with UK public bodies to better understand what is being done well and what might need improvement to give citizens confidence that they can continue to live, study and raise families here just as they have always done.

We will encourage EU and EEA EFTA citizens to contact us if they feel they are being treated unfairly and will use their evidence carefully to investigate where we think issues are affecting many people.

Any decisions that we need to make as a result of this information will be clear and transparent as it is crucial that we quickly become an organisation that is known for our impartiality and independence; and is trusted for what we say and do.

At the core of what we do are people, their lives and their families. As an organisation we are looking forward to making a difference, working where we can in partnership but not hesitating to exercise our powers where it is needed.

Finally, in what continues to be a very challenging time we would like to thank our people, our board members and everyone who has helped to establish the IMA, making sure it is ready for business.

Sir Ashley Fox | **Dr Kate Chamberlain**
Chair of IMA | Interim Chief Executive

Who We Are

The Independent Monitoring Authority for the Citizens' Rights Agreements (IMA) is an independent body that makes sure the rights of EU and EEA EFTA citizens living in the UK and Gibraltar are upheld following the departure of the UK from the EU.



We were established in 2020 by the European Union (Withdrawal Agreement) Act 2020, which implements in the UK the Withdrawal Agreement and the EEA EFTA Separation Agreement (“the Citizens’ Rights Agreements”)¹.

The citizens covered by these agreements are those from the 27 EU Member states as well as Iceland, Lichtenstein and Norway.

We became operational at 11pm on December 31st, 2020. We have a fully independent board and are in the process of finalising recruitment of our team who are based in offices at the Civic Centre in Swansea.

Our job is to monitor public bodies in the UK and Gibraltar to ensure that citizens from our European communities can continue to enjoy the same rights to live here, raising families, working and studying as they did before we left the EU.



¹The Gibraltar Independent Monitoring Authority Regulations 2020 confers functions on the IMA in relation to Gibraltar.

What We Do

The IMA monitors the application of rights of citizens from the EU and EEA EFTA countries by public bodies in the UK and Gibraltar.



This means that we actively look for information which will enable us to identify where things are going well and where things are not.

In order to do this, we:

- collect and analyse **intelligence** from a range of sources to help us understand the experience of EU and EEA EFTA citizens;
- receive **complaints** from citizens who believe that they have been, or may be, denied their rights. We review every complaint received for evidence of general problems;
- carry out **inquiries** where there are reasonable grounds to indicate general failings which affect a lot of people;
- **check** that public authorities have done what they promise to do to improve the system for all;
- consider **legal action** if a public authority has failed to implement or apply the citizens' rights agreements properly or if there is a need to clarify the law;
- **share** our knowledge of where things are going well and where things are going wrong to help everyone improve; and
- **publish** reports to explain what we do and to share what we find.

What We Do (cont)

Although we review every complaint received by the IMA and welcome comments, feedback and relevant information, we do not handle individual complaints but instead look for evidence of general problems.

This could include evidence of issues which several citizens are facing in processes or procedures or which stem from the way a public authority handles their applications or queries. We consider whether these issues are preventing the rights of many citizens from being upheld. We can also advise about other ways of dealing with the subject matter of a complaint.

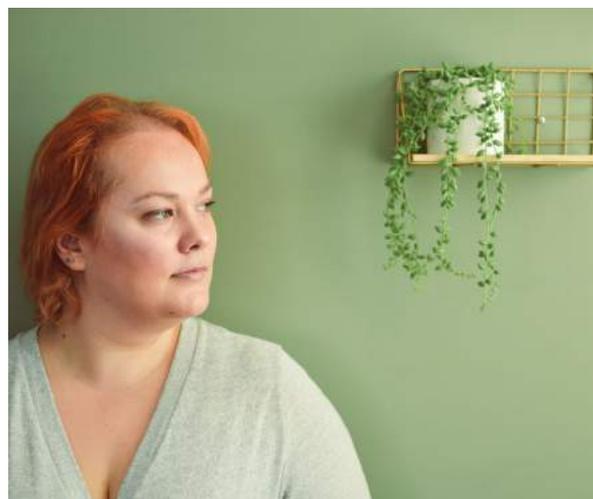
The citizens' rights we monitor are:

- residency - the right to reside and other rights related to residence – rights of exit and entry, applications for residency, restrictions of rights of entry and residence;
- mutual recognition of professional qualifications and the continued recognition of professional qualifications obtained by citizens in their countries (and already recognised in the UK and Gibraltar);
- co-ordination of social security systems - these include benefits, access to education, housing and access to healthcare; and
- workers' rights - the right to work, including self-employed people, and frontier workers who live in the EU but work in the UK and Gibraltar.

We operate across the UK and Gibraltar to help uphold the rights of citizens covered by the Withdrawal Agreement.

These citizens are:

- EU and EEA EFTA citizens and their families;
- frontier workers and their families, these are citizens who work in the UK or Gibraltar, but live elsewhere in Europe;
- UK nationals who derive rights from the citizens' rights part of the Withdrawal Agreement and EEA EFTA Separation Agreement and their families; and
- anyone who has equivalent rights to those contained in the Withdrawal Agreement or EEA EFTA Separation Agreement as a result of their eligibility to claim settled status.



Why We Do It

Our vision is that all EU and EEA EFTA citizens living here enjoy the same rights as they did before the UK left the EU.

To achieve our vision, the IMA's mission is to put upholding citizens' rights at the heart of UK public bodies' work.

Everything we do is based on our values which reflect:

our **people-centred** approach which always considers people first;

our willingness to **listen** to people and public bodies;

our **independence** from government;

our **transparency** in how we work;

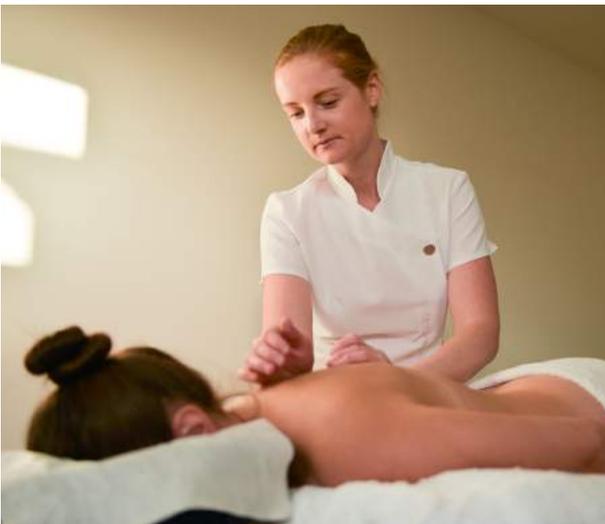
and our ability to make **impartial** decisions.



How We Deliver

Our first annual plan sets out our key priorities from the time that we became fully operational at the very end of 2020 through to the end of March 2022.

We feel it is important that we not only set out how we intend to become an effective and efficient organisation which delivers for the citizens we represent but also capture the work which was undertaken in our first three months in operation.



Key Priorities

Raise awareness of the IMA and our role in monitoring public bodies to ensure they are upholding the rights of EU and EEA EFTA citizens.

We will:	Measures and targets
<p>Develop and implement a programme of communication with all of our stakeholders. Central to this will be putting in place plans for the creation of a consultative forum in which citizens can directly influence our thinking and share their experiences.</p>	<p>Issue first publicity to invite citizens to join a consultative forum by the end of April 2021. Effectiveness of the forum will be measured by an annual survey with a target score of 60% satisfaction.</p>
<p>Grow our presence on social media in order to raise awareness of our role and communicate directly with citizens in the UK.</p>	<p>Twitter followers by end of March 2021: 2,000; March 2022: 5,000</p> <p>Facebook followers by end of March 2021: 300; March 2022: 1,000.</p>
<p>Proactively engage with media outlets in order to achieve coverage of our role, our findings and the outcomes of our work.</p>	<p>At least 12 stories/articles promoting the work of the IMA by end of March 2021.</p>
<p>Develop strong partnerships with key organisations that support citizens so they provide us with valuable early indications of where problems may be arising and signpost people to our website.</p>	<p>Signposted on 10 websites by end of March 2021.</p>
<p>Ensure that clear information is available on our website which explains what we can, and cannot, do; how we work and what we find about how public bodies are upholding the rights of citizens.</p>	<p>Publication of Annual Plan 2021/22 in April 2021.</p> <p>Publication of guidance on how we undertake our functions in April 2021.</p>

Key Priorities

Monitor the implementation and application of EU and EEA EFTA citizens' rights.

We will:	Measures and targets
<p>Assess the feasibility and cost of an initial survey of citizens living in the UK to test their awareness of the Settlement Scheme and knowledge of the IMA. The resulting analysis would help to identify where things are going well, as well as potential emerging areas of concern.</p>	<p>If feasible, exercise to be conducted by April 2021.</p>
<p>Undertake focussed analysis of data and intelligence including incoming complaints to help identify and recommend to the IMA Inquiry Team areas where there might be potential breaches of citizens' rights.</p>	<p>Initial areas of concern would be reported to the Inquiry Team by May 2021 with full analysis by June 2021.</p>
<p>Secure and implement formal training in techniques for collation, analysis and interpretation of intelligence for key staff within the Operational Delivery Directorate of the IMA.</p>	<p>Training to be completed by the end of July 2021.</p>
<p>Continue to develop the relationships and information flows with our stakeholders including public bodies, independent organisations and citizens to enhance our timely understanding of problems that may be encountered by citizens.</p>	<p>We will undertake a workshop with third sector organisations and key public authorities. This will consist of a table-top exercise underpinned by structured analytical techniques in order to identify possible future rights breaches and potential mitigation actions by December 2021.</p>

Key Priorities

To receive and consider complaints and launch inquiries to ensure public bodies are upholding the rights of EU and EEA EFTA citizens.

We will:	Measures and targets
Consider and respond to all complaints received through our website.	Confirm to the complainant whether their complaint meets the criteria for consideration by the IMA within 10 working days.
To progress potential systemic issues about the way citizens' rights have been upheld to pre-inquiry where appropriate.	Within 10 working days of responding to complainants.
To conclude pre-inquiry investigations into potential issues concerning the upholding of citizens' rights.	Within 12 weeks of being referred from the Assessment Team.
Identify opportunities for early case resolution to address systemic failings in public bodies to uphold the rights of citizens.	Within four weeks of concluding the pre-inquiry investigation.
Conduct high quality, independent and timely inquiries to identify systemic failings from information gathered and or/complaints received.	While it's difficult to predict when we will begin an inquiry, we anticipate we will have commenced our first inquiry by June 21. We also anticipate starting another four during the year. We aim to complete each inquiry within 12 months of it starting.

Key Priorities

Review the adequacy and effectiveness of the legislative framework which implements or otherwise deals with rights arising from Part 2 of the Withdrawal Agreement and Part 2 of the EEA EFTA Separation Agreement.

We will:	Measures and targets
<p>Conduct a prioritisation exercise to inform the approach to monitoring the adequacy and effectiveness of the legislative framework in terms of how citizens’ rights are upheld.</p>	<p>Analyse key pieces of legislation by the end of December 2021.</p>
<p>Work with key stakeholders to develop an intelligence-led process for identifying and analysing future developments in the relevant legislative framework.</p>	<p>Develop relationships with key stakeholders to share relevant intelligence regarding legislation by June 21.</p>
<p>Keep under review the approach to prioritisation of legislation by reference to intelligence gathered on the impact of particular pieces of legislation.</p>	<p>Ensure all key relevant new legislation is identified and analysed to understand its impact on citizens’ rights. Ongoing.</p>
<p>Report on the findings of the monitoring of legislation and how it impacts on public bodies upholding citizens’ rights.</p>	<p>Ensure the Annual Report submitted to the Specialised Committee on Citizens’ Rights (Withdrawal Agreement) and the Joint Committee (EEA EFTA Separation Agreement) reflects the findings. Early 2022.</p>

Key Priorities

Work to develop a modern workforce with a strong, transparent and open culture.

We will:	Measures and targets
Manage our resources efficiently making sure the IMA is an effective and resilient organisation that delivers for our customers.	We will deliver within our allocated budget; with IT accessible to our customers 95% of the time.
Ensure that all correspondence is replied to and we meet the statutory requirements for responses to Freedom of Information (FOIs) requests and Subject Access Requests (SARs).	<p>Correspondence is replied to within 10 working days.</p> <p>FOIs are replied to within 20 days and SARs within one month.</p>
Foster a modern workplace where staff are supported to learn, can work remotely and enjoy a strong work life balance and where our IMA identity continues to evolve.	<p>Staff have completed 90% of their mandatory training by the end of March 2021.</p> <p>A People Survey is conducted by December 2021 with a target engagement score of at least 70% satisfaction.</p> <p>IMA staff conferences are held biannually in June and December.</p>
Ensure our sickness absence is managed in a consistent, supportive and effective way so that operational and service levels are maintained.	We have a target that the average number of working days lost due to sickness absence is no more than five working days per full time employee per year.

Milestones



A number of key milestones will be completed in the first months of the IMA's operation.



These are:

1. Holding our first all staff conference in December 20.

2. Publishing our first Annual Plan in April 21.

3. Issuing publicity to invite EU citizens to take part in a stakeholder forum by the end of April 21.

4. Publication of guidelines about how we undertake our functions by the end of April 2021.

5. We anticipate that we will have commenced our first inquiry by June 2021.





IMA

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