

Consultation and Calls for Evidence Privacy Notice

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Independent Monitoring Authority
For the Citizens' Rights Agreements

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1 Introduction

The Independent Monitoring Authority (“IMA”, “we”, “us”, “our”) of 3rd Floor Civic Centre, Oystermouth Road, Swansea, SA1 3SN are committed to protecting and respecting your privacy. The IMA are committed to the protection of the personal data we process in line with the data protection principles set out in the EU and UK General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (“DPA18”).

This privacy notice (“this Notice”) explains what personal data the IMA collects from individuals who have expressed an interest in contributing to one of our consultations, calls for evidence or surveys (“you”, “your”). It also explains what information we collect automatically when you visit our website and the information we collect when you register to use our services.

The Independent Monitoring Authority is the data controller for the purposes of the GDPR in instances where you make an enquiry with us, registered in the UK with the Information Commissioner’s Office, registration number ZA804857.

As an information-led business, we place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. The IMA are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this Notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this Notice periodically to check for updates.

2 What information do we process?

Information you provide to us

We process all information you give us, either through our website <https://ima-citizensrights.org.uk/> (“our site”) or by corresponding with us by telephone, email or otherwise. This includes information you provide when you use our site, register an interest in participating in our consultations, calls for evidence or surveys, or other social media functions linked to our site, or when you report a problem with our site.

Information processed when registering to participate in our consultations or surveys

We may process the following information:

- Name
- Address
- Email address
- Telephone number(s)
- Whether participating in a personal or professional capacity
- Any information you choose to provide, such as written evidence or correspondence
- Any views or feedback on your contact with us
- Photos, audio or video recordings taken at any of our events
- Device information
- Location data

We use your name, address, email address and telephone number to contact you about your enquiry.

Participating in a professional capacity

Any information we publish will include your name, your job title/role, if relevant, and the name of your organisation. These details may also be used in other publications or publicity material, unless you inform us that you wish them to be removed. We may retain your professional contact details and contact you or your organisation to invite you to participate in other consultations, calls for evidence or events. We may also need to contact you again to discuss (if appropriate) whether you could provide additional material.

Participating in a personal capacity

Any information we publish may include your name but not your contact details. If you do not want your name published, please tell us this in writing when you send your response, so that your name can be redacted before publication.

3 Purposes and bases for processing your personal data

We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you	<p>When responding to consultation, calls for evidence or survey enquiries made via our website, by email, through our social channels or any other means, we do so as a task carried out in the public interest.</p> <p>We will not contact you beyond your participation in a consultation, calls for evidence or survey (which may include clarifying or discussing your response), unless we have your consent to do so.</p> <p>This consent may be withdrawn at any time by emailing dpo@ima-citizensrights.org.uk</p>
Carrying out consultations, calls for evidence or surveys	<p>When conducting consultations, calls for evidence or surveys, we do so as a task carried out in the public interest.</p> <p>When processing your special category data, we do so as a task carried out in the substantial public interest.</p>
Providing feedback, updates and outcomes of consultations, calls for evidence and surveys	<p>When publishing information regarding the outcomes of consultations and calls for evidence, we do so as part of our task in the public interest. We may need to publish responses in part or in full to demonstrate maintenance of correct procedure.</p> <p>When publishing information regarding the outcomes of surveys, which may include your name and / or occupation, we will do</p>



	<p>so with your consent. This consent may be withdrawn at any time by emailing dpo@ima-citizensrights.org.uk</p> <p>We may also publish photos, videos or audio recordings taken at any of our events, on our website or social media platforms. If you do not wish to appear in any media recordings, please make this clear when accepting the invitation to the event</p>
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4 Sharing your information

We will rarely share your personal data outside the United Kingdom (UK) and the European Economic Area (EEA). If this becomes necessary for the purposes of providing our services to you, we will only share it where appropriate safeguards are in place, such as the UK ICO and EU approved Standard Contractual Clauses (SCCs), to ensure your personal data is protected to the same standard expected within the UK and EEA.

Within the UK, it may be necessary to share your personal data with certain ministerial departments and other third parties concerned in your consultation, call to evidence or survey. This may include, but is not limited to:

- Department for Work & Pensions
- Department for Education
- Welsh Government
- Scottish Government
- Northern Ireland Executive
- Local Authorities
- The Home Office
- Her Majesty's Revenue & Customs

5 Your rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you, and to check that we are processing it lawfully.
- Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format (“data portability”).
- Request erasure of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g., if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of the IMA.

Some of these rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation, laws, and regulations to which we are subject. If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us at dpo@ima-citizensrights.org.uk. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

6 Data retention period

We will retain your personal data only for as long as is necessary for the purpose it was collected and for a reasonable period thereafter, to enable us to meet our obligations.

At the end of the retention period, your personal data will be securely deleted in accordance with the IMA Personal Data Retention and Destruction Policy.

7 Contact

You can contact the IMA in relation to data protection and this privacy notice by emailing dpo@ima-citizensrights.org.uk.