

# IMA

For the Citizens'  
Rights Agreements

# Annual Plan 2025-26



[www.ima-citizensrights.org.uk](http://www.ima-citizensrights.org.uk)

This is the **fifth Annual Plan** of the Independent Monitoring Authority for the Citizens' Rights Agreements (IMA) and the second which relates to our strategy for 2024-27.



# Contents

Joint Foreword	4
Introduction	6
Our Vision, Mission and Values	8
How We Fulfil Our Monitoring and Promoting Duties	9
Our Impact in 2024-25	14
Managing Risk	16
Our Commitments	17
Monitoring and Promoting	18
Trusted, Known and Credible	20
Empowering	22
Responsive, Supporting and Evolving	24

# Joint Foreword

**The IMA is an independent body which began operating in 2021. We were established as a result of the Withdrawal Agreement and the EEA EFTA Separation Agreement (the Agreements) to make sure public bodies uphold the rights of eligible EU and EEA EFTA citizens and their family members living in the UK and Gibraltar.**

The citizens in the UK and Gibraltar covered by these Agreements are those from the 27 EU Member states as well as Iceland, Liechtenstein and Norway, along with their family members.

We work to ensure that these citizens can raise their families, access education, healthcare and benefits as they would have done before Brexit.

**We review all issues from these citizens who also include:**

- EU and EEA EFTA citizens and their families including those family members who do not come from a European country
- Frontier workers in the UK and their families - these are citizens who work in the UK or Gibraltar, but live elsewhere in Europe
- In limited circumstances, UK nationals who derive rights from the citizens' rights part of the Agreements and their

families (UK nationals living in the EU or EEA EFTA states fall under the monitoring of the EU Commission and the EFTA Surveillance Authority)

- Anyone who has equivalent rights to those contained in the Agreements as a result of their eligibility to claim settled or pre-settled status under the EUSS

Our remit is wide and far reaching. Our primary statutory duty is to monitor and promote the Agreements and to support that we have a number of powers which are to receive complaints, undertake inquiries and take legal action to ensure that we are fulfilling our statutory duties.

Monitoring means we keep a check on whether citizens can access their rights under the Agreements and whether there are any systemic problems which need to be addressed.

When we talk about promotion, this means activity that we undertake which helps us improve how citizens can access their rights. This may be to address problems identified via our monitoring but could also be proactive action to guide and establish best practice for public bodies.

The complaints we receive from and on behalf of citizens continue to provide us with valuable insight and information.

In the four years since we were first established, we have learnt that the issues facing both citizens and public authorities in this area are complex and will perhaps become more so as we move further away from the date the UK left the EU.

We know we can do more to understand the environment in which we operate. In 2025-26 we will continue to refine the way we work so we can better identify issues and understand our impact, developing indicators which will allow us to measure and continuously improve, informing the public of our success.

We will continue to develop how we use information and data across the IMA, so we can be confident and assured that we are addressing those issues that matter most for citizens.

Ensuring the citizens whose rights we protect are aware of who the IMA is and what we do continues to be a priority for the organisation as is helping public bodies understand their obligations.

We therefore continue to be focussed on how we can explain our work to help

citizens understand their rights and public bodies know what they should do to uphold the rights. This includes making more of our resources available in many European languages so we can reach as many citizens as possible.

We look forward to continuing to hear from citizens and working with stakeholders to better understand any barriers as we work with public bodies to ensure citizens' rights are upheld and protected.

In 2024-25 we undertook more in-person engagements with citizens, stakeholders and governments to gain knowledge and insight into what life is like for citizens after Brexit. This also included refreshing our citizens' panel and running a recruitment campaign for new members. All of this work will continue to be important to us in 2025-26.

We continue to operate in a spirit of partnership in our work with public bodies as while we will not hesitate to use our legal powers where necessary, we know that working together, where we can, in an open and transparent manner is likely to bring swifter resolution to issues.

Our Annual Plan for 2025-26 outlines how we intend to continue to deliver for EU and EEA EFTA citizens and their family members who call the UK or Gibraltar home.

**Nicole Lappin**  
Chair of the IMA

**Miranda Biddle**  
Chief Executive

# Introduction

**This is the second year of delivery against our Strategy for 2024-27 and our four strategic objectives which are that we:**



**Monitor and promote** the effective delivery of citizens' rights as outlined in the Agreements



**Are a trusted, known, and credible** organisation who can be relied upon to act independently with fairness, transparency and impartiality



**Help empower citizens** to access their rights and public bodies to understand their rights



**Are a responsive, supportive and evolving** organisation with the right resources to operate efficiently and effectively

This Annual Plan explains how we will build on the success of the first year of our strategy, what we hope to achieve under each strategic objective in 2025-26, the work we will deliver, and how we will monitor our progress.

Our strategic objectives also underline how we deliver our statutory duties, which are to monitor and promote those citizens' rights which are set out in the Agreements.

These rights are extensive and are designed to broadly ensure those eligible citizens and their family members who have chosen to live in the UK and Gibraltar have their entitlements to work, study and access public services and benefits preserved as before Brexit.

## These rights include:



**Residency:** this means the right to live in the UK or Gibraltar – it also includes the right to enter and exit the UK



**The right to work:** this means the right to work, including self-employed work and also the right to continue to be a frontier worker



**Mutual recognition of professional qualifications:** this means the right for qualifications which have already been recognised before 31 December 2020 (or in the process of being recognised at that time) to continue to be recognised in the UK



**Co-ordination of social security system:** this means that individuals who have lived in both the UK and the EU before the end of the transition period can generally continue to be able to access pensions, benefits and other forms of social security



**Equal treatment and non-discrimination:** within scope of the rights set out above, EU and EEA EFTA citizens and their family members are entitled to be treated equally with UK citizens and not to be discriminated against on the grounds of their nationality. This includes ensuring access to certain public services such as education, healthcare and certain benefits

We will be open and transparent about what we are doing. We will report against the key results set out in this plan in our Annual Report. We will use this information to help us understand its impact on our work and how we can influence improvements.

Our Board developed and agreed our Annual Plan. They, together with our Board committees, will oversee its delivery, and provide challenge and direction to our work.

# Our Vision, Mission and Values

**Our vision is that all EU and EEA EFTA citizens and their families living here broadly enjoy the same rights as they did before Brexit.**

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 **independence** from government



Our willingness to **listen** to people and public bodies



Our **transparency** in how we work



Our ability to make **impartial** decisions



# How We Fulfil Our Monitoring and Promoting Duties

## Monitoring

The Agreements establish that individuals who qualify, obtain certain rights. When we monitor, it is to check that in the UK and Gibraltar those citizens who are entitled to those rights are able to retain and access them. This means we look at how effective the laws and actions of the governments, other public bodies such as councils and the NHS across the UK and Gibraltar, are for the citizens covered by the Agreements.

### This action can include:

#### Citizens:

Receiving complaints from citizens' where they consider they are not able to access their rights. We determine whether there are any systemic issues which require further investigation and action.

Working with stakeholders and attending citizen events to receive information from citizens as well as third party information on behalf of citizens regarding experiences of accessing rights.

#### Citizen Stakeholders:

Gathering and using information from third-sector organisations about the experience of citizens accessing their rights under the Agreements.

Using information from our own data gathering to understand the experience of citizens and take action.

Undertaking joint reviews and research with citizens' representative organisations and universities.

## Monitoring

### Public bodies:

Identifying and assessing laws, guidance and decisions made or issued by the UK Government, devolved governments and public bodies to check whether they are compatible with the Agreements.

Examining official statistics to see what picture they give us about how rights are being upheld.

Requesting data from public bodies, ombudsmen and regulators to help us build a picture of how rights are being upheld.

Undertaking an inquiry or compliance activity in relation to decisions or actions of a public body and coming to a conclusion on the compatibility of their decisions or actions with the Agreements.

Undertaking assurance reviews with public bodies to check how they are upholding rights in specific areas and if they are not, why not?

### Statutory Stakeholders:

Identifying where legislatures, including their relevant committees, are raising potential or actual issues for citizens accessing their rights under the Agreements.

Identifying how the work of others, including other regulators, impact the IMA's work on the access of citizens' rights under the Agreement.

### Other:

Using court reports to identify litigation being brought by individuals or organisations on the basis of non-compliance with the Agreements. This is for the purpose of identifying where public bodies may not be complying with the Agreements and monitoring their response.

Reviewing the media to see whether they are reporting issues or problems citizens might have with their rights being upheld by public bodies.

Using information from the EU Delegation and EU Embassies about the citizens they represent.

Obtaining insight from Members of the Board in terms of their specific knowledge of any issues/concerns/barriers, within the devolved areas.

Analysing evidence from our annual survey as well as the returns to the proforma from each of the governments about measures taken to comply with the Agreements which are needed to complete our Annual Report to the Joint Committee and Specialised Committee.

## Promoting

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### **We have a duty to take action to help to ensure that citizens with rights under the Agreements are able to access these rights.**

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Where we identify a problem from our monitoring activity, we can take action to seek to resolve the problem via activity that would contribute to fulfilling our promotion duty. While this requires the IMA to take 'action' this does not necessarily mean that it will always be for the IMA to take enforcement action. It can be the IMA taking steps to promote by encouraging others to take action. This could be highlighting matters to others, such as regulators, parliamentary scrutiny committees or the public body concerned, to get them to take action to remedy a problem. It can also include empowering citizens for them to be in a position to take action in their individual case.

This duty is not purely focused on resolving problems. It can be undertaken by highlighting good practice if that could lead to wider improvements in how citizens are able to access their rights. It could also relate to empowering public bodies by promoting recommendations and commenting on their assurances and engagement activity in relation to specific issues.

## Promoting

### This action can include:

#### Empowerment - citizens

Providing information to help citizens understand what rights they should be able to access and when.

Signposting citizens to other agencies as well as referring matters to another regulator where appropriate.

Providing information and evidence to elected representatives about issues which affect their constituents.

Using our citizens panel as a sounding board about how and what information we do and could provide.

#### Empowerment – public bodies

Publishing details of:

- Our activity (whether monitoring or promoting) where it highlights best practice of relevant public bodies so that others better understand what they should be doing.
- Our activity (whether monitoring or promoting) which highlights incompatible action by a public body or private entity so that other public bodies can understand what they should not be doing.
- The rights and when and how citizens should be able to access them.

Providing training and guidance to public bodies to help them make decisions that ensure citizens can access their rights under the Agreements.

Highlighting research or undertaking our own research to deliver insights to help public authorities better understand how to uphold citizens' rights.

**Empowerment – other stakeholders**

Providing information, guidance or training to organisations who are involved in advising or assisting citizens to help them understand the rights.

Publishing details of our activity so that they understand what we are doing to ensure access to rights for citizens, but also what we are not doing.

Taking part in public webinars to explain the rights.

Appearing before Government committees to explain what the rights are and how public bodies are upholding them - or where this is not happening.

Engaging with committees, inquiries and calls for evidence to amplify concerns about issues in relation to citizens’ rights.

Publishing our statutory reports which highlight what the rights are, and the work public bodies do to uphold those rights.

Making the issues we are investigating public via our issues’ log, so there is greater clarity about how those issues have been solved.

Intervening in existing legal proceedings to help identify issues relating to the Agreements and to help provide clarity.

**Enforcement**

Recommendations contained in an inquiry report.

Requests to a public body to remedy a breach following a compliance case or post-litigation monitoring.

Litigation taken by the IMA against a public body for failure to comply with the Agreements.

Intervening in existing legal proceedings where a public body is being challenged for failure to comply with the Agreements.

Supporting the enforcement activity of bodies such as ombudsmen etc. which also has a positive impact on the rights of EU citizens.

# Our Impact in 2024-25

## Citizens' Voice



The voice of citizens and understanding the impact on individuals' lives is really important to us, so this year we increased the membership of our Citizens Panel by 33%. We also held drop-in events in Scotland, Wales and Northern Ireland to again hear directly from citizens.

## Stakeholder Voice



We continue to develop and expand our work with stakeholders. This year we have organised roundtables for key sectors including citizen advocacy groups. We have also helped to convene panels of experts such as with our litigation stakeholder network to broaden our understanding of how rights of citizens are being upheld.

## Future Generations



We have been checking that the rights of future generations of citizens living in the UK are being protected. As part of this work, we completed our initial review into English Local Authorities for Looked After Children. We also examined how Health and Social Care Trusts in Northern Ireland are protecting the rights of looked after children and care leavers. [All our published reports can be found here.](#) Since we started this work, we know that 152 of children so far have had their rights protected.

## Practice Note



We secured a [new Practice Note in Scotland](#) which came into force on 1 December 2024. This means that when a party initiates or defends court proceedings which raise an issue relating to citizens' rights, we should be notified. This will help us better understand the experience of citizens in Scotland and where they may not be able to fully access their rights. We already have practice notes for England and Wales and are pursuing one for Northern Ireland.

## Working with Public Bodies



We have continued to work closely with public bodies as well as ombudsmen and regulators to help increase understanding of how the rights of citizens should be upheld highlighting the impact on the lives of individuals. Among key areas highlighted has been in relation to how vulnerable citizens with pre-settled status at risk of destitution should be able to [access support](#).

### Great Place to Work



We continue to score in the top 25% of places to work in the annual survey which is conducted across the public and civil service in the UK. This year our staff engagement rating was 68%.

### Legislation Monitoring



We looked at 13 key pieces of legislation to determine whether it would impact on the rights of citizens. This included legislation affecting the rights of citizens to claim winter fuel payments in Scotland, regulations in relation to disability assistance for older people in Scotland and an examination of eligibility for student support in Northern Ireland. [More details on all legislation monitoring can be found here.](#)

### Travel



We are aware that citizens can sometimes report issues while travelling and so we [issued information to remind citizens](#) with status under the EUSS about how they can spend time outside the UK without it affecting their status. We also [issued reminders of what to expect at the UK borders](#) as well as [guidance on what the further rollout of the eVisa means for citizens.](#)

### Complaints



We've been reviewing how to make it easier for citizens to tell us stories this year including ongoing work to make our complaints portal more accessible so people can tell us about the issues they are facing more easily. Up until the end of February we had received 92 complaints about a range of concerns including those relating to our four key themes of future generations, accessing support, travel and gaining status.



# Managing Risk

We have a risk management framework to identify, manage, and review risks that may impact our objectives. Risks are recorded in registers across the organisation.

Our risk appetite is defined across key areas, considering impacts on strategic objectives, core functions, independence, reputation, finances, legal responsibilities, personnel, and IT.

We proactively assess risks related to our role in monitoring and promoting EU and EEA EFTA citizens' rights.

**Below are our current key risks and our mitigation strategies:**

Risk	Key Mitigation
<b>Failure to promote or ensure correct implementation of citizens' rights may prevent access to entitlements.</b>	Maintain active oversight for proper implementation.
<b>Ineffective engagement or non-compliance from public bodies hinders monitoring efforts.</b>	Building and maintaining relationships, including escalation procedures where necessary.
<b>Communication is not effective.</b>	Continuously reviewing our messaging; implementing our communications strategy. Enhancing accessibility, including translation.
<b>Inability to focus monitoring efforts on most significant issues may impact on how citizens' access their rights.</b>	Strengthen data collection, analysis, and stakeholder engagement; developing a Knowledge Information Strategy.

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**Further detail on our approach to risk management can be found in our [Annual Report and Accounts](#).**

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# Our Commitments

In 2025-26 we have identified **four key areas** of focus which will help to deliver the IMA Strategy.



# Monitoring and Promoting

## Strategic Objective

**We monitor and promote the effective delivery of citizens' rights as outlined in the Agreements**

### Overview

Our work in this area ensures we are fulfilling our two key statutory duties to monitor how the rights outlined in the Agreements are delivered and to promote how citizens can access those rights.

How we use information and data from various sources, including citizens, stakeholders as well as research and reports, are crucial for us to perform our monitoring and promoting duties.

There is therefore an emphasis on making sure we have the right processes and ways of workings in place to facilitate robust use of this data and insight.

### Our areas of focus will be:

- Strengthening our relationships with stakeholders to identify concerns with how the rights of citizens are protected
- Reviewing the process by which citizens can complain to us about potential infringements of their rights to ensure they can raise issues with us easily and implementing any changes which are identified
- Using the information we receive and generate from various sources including insight and research from stakeholders, complaints and from analysing reports and the media, to inform day-to-day work

## What success looks like?

- Timely and effective reporting of our work – a more accessible complaints function
- Better stakeholder mapping to identify gaps and opportunities
- Strengthening the way we monitor cases before the Courts and Tribunals in England and Wales, Scotland and Northern Ireland and using the information to inform our work
- Developing a Knowledge Information Management (KIM) Strategy to inform future strategic planning and resourcing

## Key results

- An increase in the amount of stakeholder engagement by 10%
- Sixty per cent of complaints are dealt with within one working day and 100% of complaints within 10 working days so information received can be turned into action where appropriate
- Build on our work establishing practice directions in England, Scotland and Wales by seeking to establish a direction in Northern Ireland by quarter four of 2026



# Trusted, Known and Credible

## Strategic Objective

**We are a trusted, known, and credible organisation who can be relied upon to act independently with fairness, transparency and impartiality**

### Overview

In order for the IMA to be the primary point of reference for information on the delivery of the Withdrawal Agreement, it is crucial that we are recognised by citizens, stakeholders and public bodies as credible and objective.

In 2025-26 we will develop a stronger, trusted, and more authoritative voice so we can be used as a source of reliable information on what is going right and wrong in the delivery of the Agreements.

We will actively look for evidence that rights are being upheld, seeking assurance from public bodies and the governments representing all parts of the UK and Gibraltar over their actions as we are aware that an absence of complaints does not necessarily mean an absence of issues.

We will be transparent about what we do and how we do it, so citizens and stakeholders understand our role, providing clear accessible information about our findings.

### Our areas of focus will be:

- Commencing a review of how we undertake our work to assure ourselves that public bodies are upholding the rights of citizens
- Reviewing and changing how we publish information on all issues we are investigating so there is greater transparency of our work
- Increasing the ease of understanding of the information we provide by using clear, accessible language and translating information into European languages
- Developing metrics to help us quantify how we are trusted by our stakeholders

## What success looks like?

- An updated translation policy, which is implemented and monitored by the Board
- Improvements to the website in terms of accessibility and ability to provide translation – this will include the introduction of specific software that provides a range of assistive and adaptive technologies such as screen readers, screen magnifiers and text to speech
- Helping to improve understanding of our work through clear, transparent and timely entries on our issues' log on our website which detail what we are investigating
- Ensuring our work is informed by feedback from citizens, stakeholders, and insight derived from data and intelligence relating to our key themes of future generations, accessing support, travel and gaining status

## Key results

- Ensure 100% of operational and assurance reports are published on schedule
- Update the issues log within 10 working days of new investigations
- Increase positive stakeholder trust survey scores by 10%



# Empowering

## Strategic Objective

**We help empower citizens to access their rights and public bodies to understand their rights**

### Overview

Empowering citizens to understand their rights so they have better understanding of the behaviour they should expect of public bodies and where to challenge when things are going wrong is a key objective for the IMA. Ensuring public bodies understand how they should be implementing the rights is also key.

We will increase levels of awareness, understanding and confidence of the rights among citizens by providing resources and information and helping to signpost where further assistance is available.

We will increase our efforts to hear from citizens and those stakeholders working directly with citizens, so we have greater awareness of issues.

We will proactively engage with government departments, including devolved governments, to help them understand the rights they should uphold by highlighting good practices and sharing learning.

### Our areas of focus will be:

- Refreshing resources to help increase levels of awareness, understanding and confidence of rights among citizens
- Working with public authorities to improve information and awareness training of the rights under the Agreements – sharing best practice
- Undertaking an audit of the citizen journey to help develop better understanding of how we empower and signpost
- Reviewing whether our stakeholder networks are fit for purpose and implementing any changes needed
- Understanding the wider landscape of potential barriers faced by citizens by supporting research in this area and undertaking an annual citizen survey

## What success looks like?

- Benchmarking and lessons learned with public authorities to help increase their understanding of rights
- Increased understanding of rights as measured in an annual survey
- Evaluation of comms activity and engagement with comms channels
- Increased engagement and diversity of information and data received and shared with stakeholders
- Better insights from studies and research help to inform our work

## Key results

- Increase citizen understanding of rights by 10% (measured via annual survey)
- Increase engagement with diverse stakeholders by 10%
- Developing and publishing a range of material to help citizens better understand how their rights could and should be accessed



# Responsive, Supporting and Evolving

## Strategic Objective

**We are a responsive, supportive and evolving organisation with the right resources to operate efficiently and effectively.**

### Overview

It is essential our staff have the tools, skills and experience they need to perform to their best, enabling us to deliver all our objectives.

As a values-driven, learning organisation which is committed to promoting equality and diversity, we have a culture of continuous improvement so we can integrate lessons learned, embrace feedback, promote innovation, and instil best practices.

In 2025-26 we will continue to be a customer-centric, collaborative organisation that operates effectively and efficiently to monitor and promote the implementation and application of citizens' rights.

### Our areas of focus will be:

- Embedding our People Strategy to continue to attract, develop, and retain talent, fostering a diverse and inclusive culture which aligns workforce capabilities with the company's long-term strategic goals
- Ensuring high levels of service delivery aligned to our IMA Values with increased awareness of our values
- Reviewing and publishing our Equality Scheme following consultation
- Demonstrating we are an effective independent body managing our budgets, resources and data robustly



## What success looks like?

- A new People Strategy embedded across the organisation
- Greater staff awareness of the IMA Values
- Completion of agreed audits
- Completion of statutory reports to agreed timescales for laying
- Successful tenders for contracts
- Developing processes for lessons learned exercises

## Key results

- IMA employee engagement results from annual People Survey are in the top 25% of civil service scores, including for areas such as leadership and management and identification with organisation. The survey measures whether employees have pride in an organisation and recommend it as a great place to work
- Recommended learning and development plans are in place (80% of staff have agreed personal development plans)
- Increased awareness of IMA Values by 15% (measured by staff survey)





**IMA**

**For the Citizens'  
Rights Agreements**

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