
IMA

For the Citizens'
Rights Agreements



Annual Plan

2026-27

www.ima-citizensrights.org.uk



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Joint Foreword

The IMA's Annual Plan for 2026–27 marks two significant milestones for the organisation: **our fifth anniversary** and **the final year** of our 2024–27 strategy.

Five years on from our establishment it is clear that the IMA's work, helping to uphold the rights of eligible EU and EEA EFTA citizens and their families living in the UK and Gibraltar, remains vital.

The rights we have a statutory duty to monitor and promote are those that enable millions of people to live, work, study, and raise families in the communities they call home.

They are the rights enshrined in the Withdrawal and Separation Agreements, and our role is to ensure that not only do public bodies uphold those rights, but that there is greater understanding of what they are among citizens and our many stakeholders.

We are an Arm's Length Body of the Ministry of Justice with a wide and far-reaching remit. Our decisions are taken independently and made with impartiality, ensuring that we play a vital role in holding public bodies to account – a role we fulfil without hesitation when required.

We also have a number of powers: to receive complaints, take legal action where appropriate, and investigate issues to ensure citizens' rights are protected.

This Annual Plan sets out how we will deliver the final year of our current strategy, building on the strong foundations already established.



In order to undertake our work, we:

- listen to citizens’ lived experiences;
- work in partnership with public bodies and stakeholders, where we can, to resolve issues early; and
- act when rights are at risk.

Whether it’s protecting vulnerable looked-after children, securing legal safeguards, or providing accessible information in multiple languages, every action we take is designed to ensure that citizens can continue to contribute to society without unnecessary barriers.

We know that our work is important to the many EU citizens who choose to call the UK and Gibraltar home, and that what we do helps to maintain social cohesion and economic participation.

Our Annual Plan for 2026–27 explains how we will continue to deliver meaningful impact for citizens while laying the groundwork for the IMA’s continued effectiveness in the years to come.

We are aware that we do not exist in a vacuum, and in bringing together this plan, we pay heed to the world around us and consider how issues such as: a changing view of migration; pressures on the public sector; the UK’s ongoing, evolving relationship with the EU; challenges facing frontier workers; the digital transformation of immigration systems; and the ever-increasing use of technologies such as Artificial Intelligence will all have an impact on our work.

It is important, therefore, that we are looking ahead – preparing for our next strategy and the statutory review of the IMA, which is due by the end of 2028 – to ensure our work continues to evolve to meet the needs of the many EU citizens living in the UK and Gibraltar.

Nicole Lappin
IMA Chair

Miranda Biddle
Chief Executive



Introduction

This is the final year of our delivery against the four strategic objectives outlined in our [Strategy for 2024-27](#).

These 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 sets out how we will deliver those objectives; the work we will undertake and how we will monitor our progress to make sure we are meeting the aims of our three-year strategy.

Our strategic objectives underline how we deliver our statutory duties, which are to monitor and promote the citizens' rights set out in the Agreements. There is further detail about how we fulfil these duties within this plan.

The rights, which are extensive, are designed to ensure that eligible citizens and their family members who have chosen to live in the UK and Gibraltar continue to have their entitlements – such as the ability to work, study, and access public services and benefits – preserved, as they did 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



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



Access social security systems: 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 some benefits

We are committed to being open and transparent in how we work. The priorities set out in this plan will be measured and reported in our Annual Report, giving us a clear view of their impact and where we can drive further improvement.

This plan was developed and approved by our Board. The Board, supported by its committees, will oversee its delivery – providing challenge, guidance, and direction to ensure we achieve its outcomes.

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** of decision making



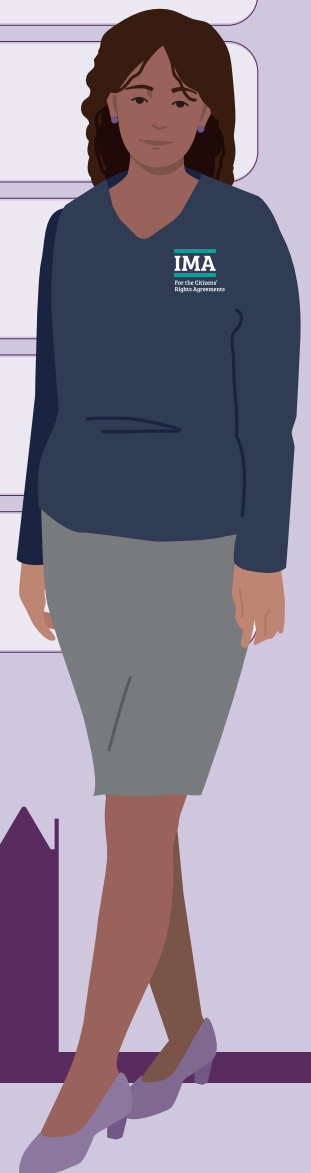
Our willingness to **listen** to people and public bodies



Our **transparency** in how we work



Our ability to make **impartial** decisions



How We Fulfil Our Monitoring and Promoting Duties

Monitoring

When we monitor, it is to check that in the UK and Gibraltar, eligible citizens can retain and access their rights. 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 as well as third party information on behalf of citizens regarding experiences of accessing rights.

Citizen Representatives and Citizen Representative Groups:

Gathering and using information from voluntary and community 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.



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, impacts the IMA's work on the access of citizens' rights under the Agreements.

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

We have a duty to take action to help to ensure that citizens with rights under the Agreements can access these rights. 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 to be in a position to take action in their individual case.

This duty is not purely focussed 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 raising awareness of the Agreements and the related rights with public bodies and empowering them by promoting recommendations and commenting on their assurances and engagement activity in relation to specific issues.



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

Making recommendations in an inquiry report.

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

Taking litigation 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 2025-26

To help citizens and stakeholders better understand our work as well as increase our ability to communicate effectively and tell our story we have grouped the IMA's work into four areas of focus. Below we outline some of the ways we have made an impact so far in these and other areas in 2025-26.

The four areas of focus are:



Travel: Citizens may experience difficulty travelling and re-entering the UK due to domestic legislation, policy, decision making by officials or a lack of clarity and information available to citizens



Future Generations: Citizens may experience difficulties in the future due to domestic legislation, policy, decision making by officials or a lack of clarity and information available to citizens



Gaining Status: Citizens may be prevented from gaining status due to decision making by officials or lack of clarity. As a result of this they may be prevented from staying in the UK when they have a right to do so



Access to Support: Citizens may experience difficulty accessing the support they are entitled to due to domestic legislation, policy, decision making by officials or a lack of clarity and information available to citizens

Travel



- We continue to provide [guidance](#) for citizens and their family members on travel. This includes launching a dedicated [webpage](#) with information on eVisas, ETA, and ID cards.
- We have publicly called on the Home Office to clarify the position for citizens who are awaiting a decision on their EU Settlement Scheme (EUSS) application and who hold a [Certificate of Application \(CoA\)](#) which confers certain rights. Our view is that CoA holders have the right to exit and re-enter the UK.

Future Generations



- We ran a [campaign on children's registration for EUSS](#), urging parents to check if they need to apply for their child. This ensures children's rights including rights to healthcare. The campaign received positive feedback and opened opportunities for further stakeholder collaboration.
- Our [work with local authorities](#) continues to ensure they are making EUSS applications for eligible looked after children and those in care. More than 1,000 children have been identified, and good practice is being shared among councils.

Gaining Status



- We raised concerns about the [Immigration \(Citizens' Rights Appeals\) \(EU Exit\) \(Amendment\) Regulations 2023](#), which allow removal of individuals accused of fraudulent or abusive EUSS applications before appeals conclude. We believe this is contrary to the Agreements. The Home Office has agreed to share data, litigation updates, and draft guidance with the IMA.
- We intervened in a [case, BZ](#), the first matter concerning interpretation of Part 2 of the Agreements referred to the Court of Justice of the European Union. The IMA played a key role in assisting the court to decide the referred question.
- We completed an Inquiry into delays with processing EUSS applications, scheduled for publication in December 2025. It highlights systemic delays in the EUSS process and recommends improvements.

Accessing Support



We raised concerns with the Home Office about pre-settled status retention in [domestic violence visa routes](#) and dual registration with EUSS. Policy and guidance updates are underway.

Complaints



We redesigned and relaunched the [complaints' portal](#) for a better user experience. We also launched [Your Story](#) to allow citizens to share information anonymously, informing our work. We received 117 complaints in 26-27.

Citizens' Panel



We consulted panel members on meeting formats to ensure usefulness and introduced in-person meetings where possible. This year, we met members in Manchester, London, and Gibraltar. Panel feedback remains invaluable, particularly on travel issues.

Annual Survey



We conducted a [survey of citizens](#) in the EU and Gibraltar, receiving almost 2,300 responses. Results will inform future workstreams. We used varied collection methods to reach under-represented cohorts, targeting areas with high EU citizen populations.

Stakeholder Engagement



We engaged with senior government officials, including ministers and committees, to advocate for the Agreements and address planning requirements.

We broadened our network to include civil society organisations and hosted citizens' panels and drop-in sessions to gain deeper insights into citizens' experiences.

Staff Engagement



We reviewed and relaunched our staff-led forum, focusing on three areas: two-way communication between staff and leadership, problem-solving and innovation, and championing staff wellbeing.

We engaged with senior government officials, including ministers and committees, to advocate for the Agreements and address planning requirements



Managing Risk

The IMA maintains a robust risk management framework to identify, assess, and mitigate risks that could impact its ability to uphold the rights of EU and EEA EFTA citizens in the UK and Gibraltar. Risks are reviewed regularly and recorded in registers across the organisation. Our risk appetite is defined across strategic, operational, legal, reputational, financial, and technological domains.

Risk Appetite Statement

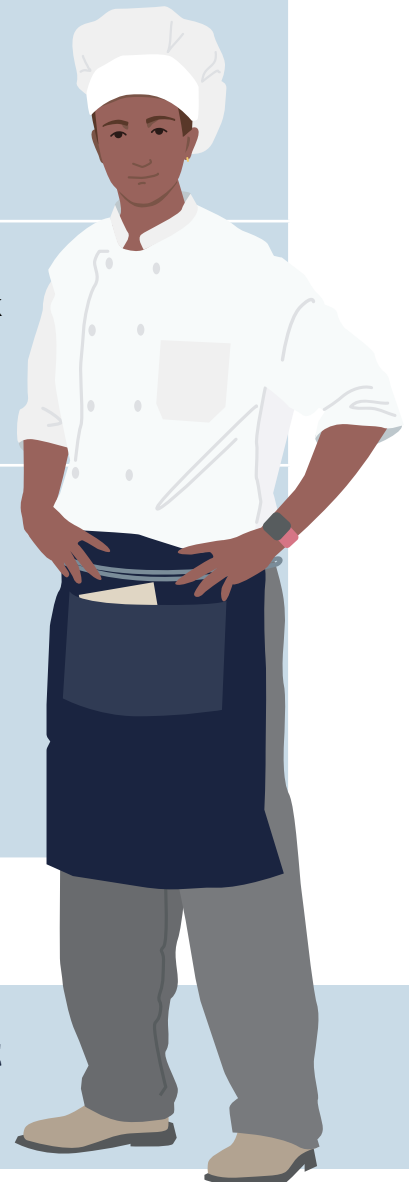
The IMA maintains a **low appetite for risks** that compromise its statutory independence, legal compliance, or the rights of citizens. It accepts **moderate risk** in areas of innovation and outreach where benefits to citizens may outweigh operational uncertainties.

We are operating in a changing landscape, which presents the IMA with emerging risks. These include the changing views of migration, digital transformation of immigration systems, pressure on the public sector, challenges facing frontier workers, the UK's ongoing and evolving relationship with the EU, and the increased use of technologies such as Artificial Intelligence.



Below are our current key risks and our mitigation strategies which are reviewed on a regular basis:

Risk	Key Mitigation
<p>The IMA communication strategy is ineffective in raising awareness of the rights and demonstrating strategic impact, resulting in a limited understanding of the rights, and a reduced trust in the IMA</p>	<p>Continuously reviewing our messaging; reviewing impact of our communications strategy, website translation and accessibility features</p>
<p>The IMA fails to maximise its resources and plan effectively in its delivery of strategic priorities, this includes maximising the use of data and new technologies</p>	<p>Developing longer term work force plans based on risk / succession planning</p> <p>Development of digital strategy</p>
<p>The IMA is unable to secure its intended impacts for citizens due to weaknesses in programme and delivery management</p>	<p>Roll out of Quality Assurance Framework and strengthened approach to programme planning</p>
<p>The IMA is unable to secure its intended impacts for citizens because we don't effectively influence/ require public authorities to demonstrate effective implementation and make necessary changes</p>	<p>Strengthened framework for reporting and focus on systemic issues</p> <p>Strengthen data collection, analysis, and stakeholder engagement</p>



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

Our Commitments for 2026-27

In 2026-27 we have identified four key areas of focus for our work which will help to deliver the IMA Strategy for 2024-27. These are:

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. It also covers the use of our statutory powers: to carry out inquiries and to intervene through the legal system.

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.

How we use information and data from various sources including citizens and stakeholders as well as research and reports continue to be 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 for 2026-27 will be:

- Strengthening our relationships with stakeholders to identify concerns with how the rights of citizens are protected
- Using the information we receive and generate from various sources (including insight and research from stakeholders, complaints, analysing statistics and other data, legislative monitoring, and from analysing reports and the media) to understand the key areas of risk in relation to the effective implementation of citizens' rights
- Strengthening our approach to planning and delivering our operational work, including a strengthened framework for quality assurance and an updated process for carrying out inquiries

What success looks like?

- We have a more visible risk-based programme of operational work, including a medium-term work plan, which is informed by a broad evidence base
- More timely and effective reporting of our work, to include more clearly setting out: our views on key issues, our conclusions, and intended impacts
- The quality of the IMA's work and outputs is continuously improving
- We promote positive changes that better implement and clarify citizens' rights
- We have reviewed our overall approach to operational work, including an updated approach to planning and delivering inquiries

Key performance indicators

- We will deliver a programme of work to improve core operational processes, including programme planning, quality assurance, knowledge management and operating procedures. The Board will oversee progress through regular reporting against milestones
- For at least 80% of complaints, we will: (a) provide an initial response within 10 working days; (b) communicate our decision on what, if any, further work to carry out within 10 days of a decision; and (c) share the outcome of our work with the complainant and on our website
- For at least 80% of our statements and reports, we will publish the output within four weeks of conclusion of any relevant discussions between the IMA and the relevant public authority. This will apply to all reports arising from inquiries, compliance and assurance work, as well as summaries and detailed documents from our litigation activity and legislative monitoring

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 Withdrawal Agreement it is crucial that we are recognised by citizens, stakeholders and public bodies as credible and objective.

In 2026-27 we will continue to 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 explore different ways to 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 and what it means for citizens and their rights.

We will also be clear about our independence from government and the role we play in holding public bodies to account where necessary.

Our areas of focus for 2026-27 will be:

- Making sure the information we produce helps increase transparency regarding operational work and our decisions
- Continuing to develop new ways to promote and raise awareness of the Agreements and associated rights, to reach a wider and more diverse network of stakeholders finding new ways to gather feedback from stakeholders about how we operate and what we communicate
- Explaining our independence and what it means for us in operational decision making

What success looks like?

- The IMA website is updated regularly to reflect our current operational programme of work. Key decisions are communicated in a timely way and information explaining our decisions is included where appropriate
- Our work is communicated in different formats depending on the audience. The language we use is clear and straightforward to facilitate translation
- We have a robust metric for measuring stakeholder trust, which shows improvements year on year
- The IMA has a clear position about what its independence means, and how it is delivered

Key performance indicators

- Engagement with our content on our social media accounts and website, measured by tracking, has increased by 10%
- We will increase by 10% the number of times we present information regarding the Withdrawal Agreement and our work to stakeholders in a public forum
- We will develop and implement a framework for improving, measuring and reporting stakeholder engagement across our work. The Board will oversee progress through regular reporting against milestones

In 2026-27 we will continue to develop a stronger, trusted, and more authoritative voice



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. While helping public bodies understand how they should be implementing the rights is also an important part of our role.

We will continue to diversify the resources and information we provide to citizens, signposting to where further assistance is available so we can increase levels of awareness, understanding and confidence of the rights.

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 for 2026-27 will be:

- Understanding the wider landscape of potential barriers faced by citizens by supporting research in this area and undertaking an annual citizen survey
- Identifying the areas where citizens are more likely to benefit from additional knowledge and information regarding their rights and producing material to fill those gaps
- Continuing to broaden the range of materials and methods of communication to reach more citizens
- Assessing the usefulness and impact of our existing resources
- Highlighting and sharing good practice being adopted by public authorities in how they ensure citizens' rights
- Ensuring that the results of our work are promoted with wider public authorities

What success looks like?

- A clearer picture of where citizens may benefit from clarity on their rights
- A more diverse range of resources available to citizens and public authorities to help improve understanding
- Public authorities being signposted to good practice to help inform their future activity.
- Public authorities becoming more aware of citizens' rights considerations in the development of new policy

Key performance indicators

- Developing and publishing a broader range of materials to help citizens better understand their rights in the areas that matter. This will be measured through an increase of 10% in engagement with these materials as measured through tracking on our social media accounts and website
- We will produce a resources page on our website with landing pages for citizens and public authorities by September 2026. A feedback assessment tool will be embedded on our website with the ability for visitors to provide feedback. The IMA will provide a summary of the feedback and the associated development plan by February 2027

We will continue to diversify the resources and information we provide to citizens



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 2026-27 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 for 2026-27 will be:

- Further embedding our People Strategy to continue to attract, develop, and retain talent, fostering a diverse and inclusive culture which aligns workforce capabilities with our long-term strategic goals
- Responding to staff feedback via the People Survey and pulse surveys to ensure our people's experience at work continues to improve and the IMA continues to be a great place to work
- Ensuring high levels of service delivery aligned to our IMA Values, embedding our values throughout our work
- Embedding equality, diversity and inclusion throughout the IMA and in our work, including reviewing and publishing our Equality Scheme
- Demonstrating we are an effective ALB managing our budgets, resources, governance, risk and data robustly

What success looks like?

- Key elements of our People Strategy are delivered including implementing the recommendations from our recruitment review and fostering a learning organisation that engages and motivates our people
- Our values underpin our work and drive service delivery
- An effective and appropriate audit programme delivered within appropriate timescales
- Statutory reports completed to agreed timescales for laying
- Effective management of our Finance arrangements and commercial contracts
- Lessons learned exercises embedded across the IMA to support continuous improvement
- Enhanced management of data, processes and productivity through the use of AI and development of staff skills to use AI effectively
- Enhanced decision-making processes by empowering our people to make decisions in their work

Key performance indicators

- IMA employee engagement results from annual People Survey are maintained or improved across the areas of leadership and managing change, organisational objectives and purpose, culture and how likely employees are to recommend the IMA as a great place to work. This will be measured via pulse surveys in year and through the annual engagement exercise with staff in 2026. We will:
 - Develop an action plan to address key areas for further improvement by May 2026.
 - Update staff on progress made within the action plan by September 2026
- Effective Learning and Development (L&D) plans are in place for all staff which includes identified L&D activity for the year. Feedback from staff measured by pulse surveys shows a 10% increase in staff reporting their line manager actively supporting their personal development
- Statutory reports are completed by the relevant laying date, with no significant areas of concern noted with IMA compliance across the Management Assurance Statement and functional standards. This would be measured by feedback from GIAA, NAO and the Business Assurance Meeting with MoJ
- Agreed actions from continuous improvement / lessons learned exercises are implemented to agreed timescales



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