

Information Session:

Update on the Afghan Routes to the UK

19 August 2025 – information correct at time of presenting

Afghan
Pro Bono
Initiative

Housekeeping

- Recording the session
- Answering questions
- Sharing feedback

Agenda

1. Speakers
2. About APBI
3. Refresher: Afghan routes to the UK
4. UPDATE: Closure of ARP
5. UPDATE: ARAP and EGS data breach
6. Scenarios and steps you can take
7. Q&A

Introductions



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About APBI



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REFRESHER: AFGHAN RESETTLEMENT ROUTES

1. Afghan Relocations And Assistance Programme - called ARAP
2. Afghan Citizens Resettlement Scheme – called ACRS and made up of 3 “Pathways”
3. Ex-Gratia Scheme – called EGS
4. Afghan Response Route – called ARR



The Afghan
Resettlement
Programme
- ARP

AFGHAN RESETTLEMENT PROGRAMME (ARP)

ARAP	ACRS Pathway 1	ACRS Pathway 1 Stage 2	ACRS Pathway 2	ACRS Pathway 3
Opened 01/04/2021	Opened 13/08/2021	Opened 30/07/2024	Opened 06/01/2022	Opened 20/06/2022
Closed 01/07/2025	Closed 28/08/2021	Closed 30/10/2024	Closed 01/07/2025	Closed 15/08/2022
4 categories of eligibility, 3 of which offer relocation to the UK. Eligibility for all categories based on: - direct employment by the UK in Afghanistan - OR - providing goods/services to UK under contract - OR - closely working alongside the UK government - AND - being at risk - AND/OR - being publicly recognised as working for UK - AND/OR - having contributed to the UK mission's success	2 categories of eligibility related to Op. Pitting: - Evacuation during Op. Pitting; - OR - Clearance and invitation for evacuation that could not be achieved.	3 categories of eligibility, all based on a Sponsor with status under Pathway 1. i. Sponsors <u>over 18</u> when evacuated: - Spouse or Partner - Children born after 28 August 2003 and not independent ii. Sponsors <u>under 18</u> when evacuated: - Parents - Siblings (aged under 18) iii. In exceptional circumstances: - Parents (Sponsors over 18 when evacuated) - Adult children (Sponsors over 18 when evacuated) - Siblings (Sponsors over 18 when evacuated) - Siblings over 18 years old (all Sponsors) - Other relatives (all Sponsors)	There was no open application process. Required a referral from UNHCR for resettlement with the applicant being <u>outside</u> Afghanistan.	2 stages/ categories of eligibility: Stage 1: i. Employees of the British Council ii. Employees of GardaWorld iii. Chevening Scholars and alumni Stage 2: Required referral by international agencies and covered: a. those who stood up for values such as democracy, women's rights and freedom of speech, rule of law b. vulnerable people, including women and girls at risk, and members of minority groups at risk (including ethnic and religious minorities and LGBT).

OTHER AFGHAN SPECIFIC ROUTES

EGS		ARR	
Opened	04/04/2013	Opened	Unknown – after 08/2023
Closed	30/11/2022	Closed	04/07/2025
This scheme was for “Locally Employed Staff” of UK government departments (for example the Ministry of Defence or Foreign Commonwealth and Development Office). Eligibility categories expanded over time but in summary, it was for locally employed staff who: - Were made redundant because of the UK’s military drawdown from Afghanistan. OR - Were made redundant on or after 01/05/2006 and had spent 12 months or more continuous service outside the wire on the frontline (mostly Helmand). OR - Resigned on or after 01/05/2006 and had spent 12 months or more continuous service outside the wire on the frontline (mostly Helmand). To be eligible for RELOCATION to the UK, the LES must have: - been employed directly, in a role which took them regularly outside the wire on the frontline (mostly in Helmand) - resigned or been made redundant on or after 01 May 2006; and been directly employed on the frontline (mostly in Helmand) for a minimum of 12 months or more continuously. - been seriously injured and they would have been eligible under the above, had their employment not been terminated due to injuries sustained in combat.		Information about this route is limited because it was not publicly announced. According to information that is now available, to be eligible for an invitation to resettle in the UK, a person had to be: - impacted by the data incident; - categorised as at highest risk of targeting by the Taleban, as a result of being included in the breach; - located in a high risk country; and - not have previously been found eligible under either the Afghan Relocations and Assistance Policy (ARAP), the Afghan Citizens Resettlement Scheme (ACRS) or any other route which provides ‘settled status’ (i.e. Indefinite Leave to Enter (ILE) or Remain (ILR)) in the UK.	

FAMILY MEMBERS							
	ARAP	ACRS Pathway 1	ACRS Pathway 1 Stage 2	ACRS Pathway 2	ACRS Pathway 3	EGS	ARR
IMMEDIATE FAMILY MEMBERS (IFM)	One spouse/partner Children aged under 18 at the time of the application	NOT APPLICABLE	NOT APPLICABLE - see route eligibility	One spouse/partner Children aged under 18 at the time of the application	One spouse/partner Children aged under 18 at the time of the application	Covered by Part 7 of the Immigration Rules – now deleted	NOT APPLICABLE
PROCESS FOR IFM	Included in application form and automatically considered for relocation			Separate application under Family Reunion (Immigration Rules)	Included in application form and automatically considered for relocation		
ADDITIONAL FAMILY MEMBERS (AFM)	Children aged over 18 at time of application. Any other relative.			Children aged over 18 at time of application. Any other relative.	Children aged over 18 at time of application. Any other relative.		
PROCESS FOR AFM	Separate application for when Principal is given positive eligibility decision. Must be made within 30 days.			Separate application under Immigration Rules : Family Reunion, CRP, ADR, Partner etc.	Separate application for AFM when Principal is given positive eligibility decision.		
ELIGIBILITY TEST FOR AFM	Heightened risk due to Principal's work. Exceptional dependency on the Principal.			Requirements under the Immigration Rules	Exceptional dependence due to specific vulnerabilities or circumstances		
WHO CAN SPONSOR?	Only the Principal ARAP applicant – not family members of the ARAP applicant			Anyone holding Refugee Status	Only the Principal ACRS applicant – not family members of the ACRS applicant		

CHALLENGING A REFUSAL

	ARAP	ACRS Pathway 1	ACRS Pathway 1 Stage 2	ACRS Pathway 2	ACRS Pathway 3	EGS	ARR
APPEAL RIGHT	No	NOT APPLICABLE	No - according to the guidance	Yes – to the Immigration and Asylum Chamber	No	No	No
REVIEW RIGHT	Yes		Yes	No	No	No	No
DEADLINE	Within 90 days of the decision unless compelling reasons could not.		Within 28 days of the decision	Within 28 days of the decision	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE
GROUND OF REVIEW	Failure to apply policy New evidence available		Factual error	Decision breaches the European Convention of Human Rights.	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE
OTHER OPTIONS	Judicial Review – within 3 month of the decision		Judicial Review – within 3 month of the decision		Judicial Review – within 3 month of the decision	Judicial Review – within 3 month of the decision	Judicial Review – within 3 month of the decision

UPDATES

1. UPDATE: Closure of ARP
2. UPDATE: ARAP and EGS data breach

UPDATE: CLOSURE OF ARP

On 18 December 2024, the Ministry of Defence announced that the government was combining the Afghan resettlement routes (ARAP and ACRS) into the Afghan Resettlement Programme.

On 1 July 2025, the UK government announced that the ARP was closing to new applications from 15:00GMT.

MOST PEOPLE ARE NOT LIKELY TO BE AFFECTED BY THE CLOSURE.

This is because out of all of the available routes, only ARAP had a direct application process that was closed on 1 July 2025. The rest had closed well in advance:

	ARAP	ACRS P1	ACRS P1S2	ACRS P2	ACRS P3	EGS	ARR
Opened	01/04/2021	13/08/2021	30/07/2024	06/01/2022	20/06/2022	04/04/2013	Unknown after 08/2023
Closed	01/07/2025	28/08/2021	30/10/2024	01/07/2025	15/08/2022	30/11/2022	04/07/2025

The closure of the ARP does not affect any applications that had been submitted by 15:00GMT on 1 July 2025.

The closure of the ARP does not affect any Reviews that have been submitted under ARAP or ACRS Pathway 1 Stage 2 and remain undecided.

The closure of the ARP may not affect any applications that have had decisions on Reviews.

Although the closure of the ARP is unlikely to affect many people, we understand it will have caused anxiety and applicants may be wondering what they can do now.

Options will depend upon the individual circumstances of the applicants but to try and help, we will go through some scenarios that we think are the most common and explain what can be done.

UPDATE: ARAP and EGS data breach

On 15 July 2025 the UK government announced there had been a major data breach of personal data included in applications to the UK's Afghan Resettlement and Assistance Policy (ARAP) and its forerunner, the Ex-Gratia Scheme (EGS).

The UK government has stated that applications which were affected were those made on or before 7 January 2022. The breach involved disclosure of a spreadsheet containing personal details of 18,714 Principal applicants for the EGS and ARAP schemes. There are Dari and Pashto translations of the announcement.

The full details of the data breach are not publicly known but, we understand from various reports that:

- i. It was data that was in a spreadsheet
- ii. That spreadsheet included the names, biographical information, contact details for applicants and family members
- iii. The spreadsheet may also have contained the reasons for which they were applying for relocation and their contacts in the UK

IMPORTANT: If you never applied for ARAP or EGS (for example, you applied only for ACRS) or you applied after 7 January 2022, your details will not have been on the spreadsheet.

It has been reported that the breach occurred in February 2022. It has also been reported that it was because the individual at the Ministry of Defence who disclosed the data was hoping to confirm the validity of a limited number of applications but was not aware that the spreadsheet still contained a wider set of applications.

The government became aware of the breach in August 2023. An excerpt of the data was posted to a Facebook Group and a number of media organisations were notified who contacted the Ministry of Defence.

The government took legal steps to prevent the document being disclosed further and to stop news of it being published.

The government also set up the Afghan Response Route (ARR) to resettle people it felt were most at risk as a result of the breach.

On 15 July 2025 the legal measures were lifted because the government has considered that inclusion on the data set no longer puts someone at risk. The government confirmed that the ARR was closed on 4 July 2025.

We understand you are likely to be feeling very anxious about this. We will explain what you can do if you think you have been affected.

Scenarios and steps you can take

This section will cover the most common situations that we think applicants are in:

- Your data may have been breached
- You have been waiting a long time for your application to be determined
- You received a negative decision and want to know what you can do
- You want to bring a family member to the UK but are unsure if you can

If your situation is not covered, please use the Q&A function and we will try to answer your question at the end.

I think I am affected by the data breach, what can I do?

You are only at risk of having been affected by the data breach if you submitted an ARAP or EGS application on or before 7 January 2022. If this applies to you:

1. You may have received an email from the Defence Afghan Relocation and Resettlement team. Copies of the letters that they have sent out to individuals that they think are affected have been published on the Ministry of Defence website.
2. You can use the Data Incident Self-Checker to find out whether you (and any family or dependants cited in your application) are affected.

Anyone who is likely to be affected will see this message:



If you submitted multiple applications, you may have been given more than one reference number. The Government guidance explains that you will need to check every reference number you have been given.

If you are not likely to be affected, you will get this message:



If you don't know your ARAP, EGS, or ATAE reference (or do not know all of them) you can ask the Ministry of Defence to tell you. Make sure you give all of your names (especially if you can spell your name in multiple ways) and you may be asked to give more information if they cannot immediately locate your records.

If you are affected:

1. Take security measures (for you and your family)

The advice is to:

- consider changing your contact details – make sure you maintain access to the address given in your application form in case the DARR team need to contact you.
- be especially careful of taking phone calls or responding to messages or emails from unknown contacts;
- limit who can see your social media profiles and consider shutting them down if you need to;
- be careful of accepting friend/follow requests from individuals you do not know and trust;
- monitor your online accounts to check for any unauthorised access or change in settings;
- where possible use a Virtual Private Network (VPN) to access the internet;
- be wary of telling anyone that your personal data may be vulnerable because you may draw attention to the fact that your information could be exploited;
- be particularly careful if travelling or crossing an international border.

2. Ask for a copy of your ARAP application form (if you do not have it already)

The information that is included in the data breach is information that you will have provided to the ARAP team as part of your application. If you do not have a copy of the application, you can ask for it so that you can understand what information about you might be in the breach.

You can make a “Subject Access Request” (SAR) - where you ask a government department to give you a copy of all the records that it holds about you – to get a copy.

You should make a SAR request to the Ministry of Defence in Afghanistan on the online form.

You may also want to ask other government departments for their records as well. This is particularly the case where you worked with or alongside other Government Departments in Afghanistan. To do this, we recommend you search in the individual webpages of the government agency you worked with for the specific SAR process.

3. Contact DARR if you believe that the data breach has put you or your family at greater risk

The UK government has said that:

- It believes that the risk to people whose personal data was included in the spreadsheet is no longer high.
- It does not believe that the Taliban will use the information to target anyone and that this is why the ARR closed.

You may disagree with this and have reasons to believe that you or your family are likely to be targeted and you may wish to write to the Ministry of Defence. You should explain the impact of the data breach on you and your application, with an explanation for why you are particularly at risk.

Template letters are available in English, with instructions and information in Dari and Pashto on the Refugee Legal Support website.

4. Consider if you want advice on compensation

Even if you were found eligible for relocation and your application is finished, you may still want advice.

The data breach will not affect your status in the UK. But you may be eligible to make a claim for compensation. A claim for compensation should not affect your status in the UK or prevent you from being able to Naturalise as British.

There are a number of law firms who may be able to advise you on whether you have a compensation claim.

- Wilsons Solicitors LLP: public@wilsonllp.co.uk
- Leigh Day: ARAPdatabreach@leighday.co.uk
- DPG: newcaseenquiries@dpglaw.co.uk

I made an application for ARAP and I'm still waiting

The closure of the ARAP scheme to new applications does not mean that your application will now be disregarded or forgotten.

Delays are extremely common: you are not alone. The high number of applications and the complexity of the evidence, in comparison to the number of decision makers, means there are reports that there are 22,000 ARAP applications which are waiting to be decided.

This is the case for both initial applications and Review requests.

It may take time for your application to be considered but you may want to:

1. Gather evidence about how the delay is affecting you.

For example, the delay may be affecting you because as time goes on:

- you are struggling to support yourself financially (savings are running low; you cannot work; you are regularly changing accommodation to avoid being found; you have to pay bribes; etc.)
- you have health problems and cannot access treatment (you can't afford it or cannot travel for it)
- you are at risk of being returned to Afghanistan (your visa has expired or will soon expire)
- you are experiencing poor mental health (you are stressed and upset, worried about family)

If this is the case, you should put together documentary evidence which shows these things. For example:

- financial records (money transfer receipts, bank statements, deposit receipts)
- medical records (prescriptions, diagnostic paperwork)
- evidence of your leave to remain if you are outside Afghanistan
- photographs
- copies of threats or messages you have had

If you cannot get documentary evidence of the ways that the delays are affecting you, you could write a witness statement. You could also ask relatives or neighbours to provide statements which confirm your difficulties.

If you are in the UK and you are struggling with your mental health, you should go to speak about this with your GP.

2. Contact DARR with the evidence of how the delay is affecting you

You can ask for your application to be expedited because of the problems you are facing. You should explain why you need a decision quickly and what you are worried will happen if you do not get an answer.

3. Consider contacting your MP or if you have relatives in the UK, ask them to contact their MP.

Members of Parliament are able to ask government departments questions on behalf of their constituents. You could ask you MP to ask the Ministry of Defence why the application is taking so long. An example of a letter that you can send is available on our website.

4. Request a copy of your records from the Ministry of Defence

Getting a copy of the records can be helpful because it might show you what is causing the delay. It can take around 30 days for the records to be released and you will need to provide evidence of your identity. The Ministry of Defence has an [online application](#) for subject access requests.

5. Contact a lawyer for advice about challenging the delay

If you have tried all of the above and are still waiting, you may want to ask a lawyer to help you prepare something called a “pre-action letter” to challenge the delay by judicial review. It is important to get legal advice and assistance, because judicial review is a complex process and you are at risk of a costs order if you lose.

I made an application for my “additional” family members under ARAP/ACRS and we are still waiting

The UK draws a distinction between “immediate” and “additional” family members in a way that is culturally very different than Afghanistan. As a reminder:

FAMILY MEMBERS OF THE “SPONSOR”				
	ARAP	ACRS Pathway 1 Stage 2 – Sponsor aged >18	ACRS Pathway 1 Stage 2 – Sponsor aged <18	ACRS Pathway 3
IMMEDIATE FAMILY MEMBERS (IFM)	One spouse/partner Children aged under 18 at the time of the application	One spouse/partner Children born after 28/08/2003	Parents Siblings aged under 18 at time of application	One spouse/partner Children aged under 18 at the time of the application
ADDITIONAL FAMILY MEMBERS (AFM)	Children aged over 18 at time of application. Any other relative (siblings, uncles, aunts, cousins, nephews, nieces)	Children born before 28/08/2003 Parents Any other relatives (siblings, uncles, aunts, cousins, nephews, nieces)	Siblings over 18 years old Any other relatives (aunts, uncles, cousins, nephews, nieces)	Children aged over 18 at time of application. Any other relative.

Additional family members will not automatically be resettled. You must show that there are exceptional reasons that they need to come to the UK with you, or to join you.

Because additional family members must have “exceptional” reasons for coming to the UK, there are often lengthy delays on decisions. This is the case for both initial applications and Review requests, on both ARAP and ACRS applications.

It may take time for your application to be considered but you may want to follow all of the steps outlined above for delays in initial / review applications for a main applicant:

1. Gather evidence about how the delay is affecting you and your family.
2. Contact DARR with the evidence of how the delay is affecting you and your family.
3. Consider contacting your MP or if you have relatives in the UK, ask them to contact their MP.
4. Request a copy of your records*.
5. Contact a lawyer for advice about challenging the delay

*For ARAP records, make the request to the Ministry of Defence. For ACRS applications, the scheme is managed by the Home Office. If you have made an application for family members under the ACRS scheme, you should request your records from the [Home Office](#).

I have been told that I am not eligible for ARAP / ACRS

There are no rights of appeal against a negative eligibility decision under either ARAP or ACRS Pathway 1 Stage 2. If you disagree with a decision about your eligibility or about the eligibility of your family members, you can submit a Review request.

	ARAP	ACRS Pathway 1 Stage 2
Deadline for Review	<u>90 days</u> from date you receive the decision	<u>28 days</u> from date you receive the decision
Reasons an out of time application will be accepted	Exceptional circumstances prevented you from doing so (ill-health, inaccessibility)	Exceptional circumstances prevented you from doing so (ill-health, inaccessibility)
Reasons you can challenge the decision	The decision is not in accordance with policy. You have new evidence which was not available when the decision was made.	The decision contains a factual error
Timeframe for a decision	No standard timeframe	No standard timeframe

For ARAP cases, there is an online form to complete to submit a Review request. That form remains online and available. For ACRS applications, a Review request should be sent by email to ACRSp1separatedfamiliesinforequest@homeoffice.gov.uk.

After you submit your Review request, you are likely to be asked to provide any further evidence or reasons for the Review and you will usually be given 14 days to provide it.

You should make sure that you explain why you think the decision is wrong, especially if you think that the decision-maker has not seen evidence that you submitted in support. Please see the APBI self-help guide at section 7 for information about how to prepare a Review request.

Important: As well as submitting a Review request, you should make a subject access request to the Ministry of Defence for your ARAP decision minute so that you can better understand why your case was not accepted. You should specifically ask for the decision minute and any other documents that have been used to decide your case.

If you are asking for a Review of your ACRS application, you should make a subject access request to the Home Office to ask for the decision minute. This will help you understand better why your family were found ineligible.

My Review request was unsuccessful

If you asked for a Review and the decision that you are ineligible was maintained as a result, usually this would mean that your application is finished and there was no further option for challenging the decision within the ARAP and ACRS scheme.

However, there are two things that you could do if you think that the decision is wrong:

1. You could request a second Review: this option would be best if you have further, compelling, new evidence that was not available at either the initial application, or when the review was undertaken.

Examples of compelling new evidence could include:

- your details were part of the data breach and you think that it puts you at risk (or increases your existing risk);
- you have obtained copies of contracts that show you worked for the UK or a supplier;
- you have new supporting evidence from former employers or UK contacts which confirm how important your work was;
- you have new evidence of targeting, harassment and persecution by the Taliban because of your work.

If you can, a second Review request would be stronger if you can provide a statement to explain the evidence, how you got it, and why you are at risk.

If the risk is because of the data breach, you should include detailed information about any new threats that you or your family members have received, any house searches, arrests or other harassment experienced and why you believe it is connected to the breach. You can use the [APBI ARAP self-help guide](#) which includes a section on witness statements; (see page 32; Appendix 2).

2. You could consider a judicial review claim: this option would be best if you think that you have put forward all the evidence required and the DARR team have made a mistake about how they have decided you are ineligible.

Judicial review is where you ask a judge to look at how a decision was made – whether the evidence was considered properly, the policy applied properly, or if the decision is unreasonable/irrational in comparison to the application. It is a complex process and can be expensive. If you are successful, the Ministry of Defence will have to remake the decision. If you are unsuccessful, you are usually expected to pay for the government's costs of defending the decision. This means that you should seek legal advice before you start a judicial review case.

Please note, there is a deadline to issue a judicial review claim in court – as soon as possible and no later than 3 months from the date of the decision. Before you can issue the claim, you usually have to send a pre-action letter to the Government to notify its lawyers that you intend to make a claim and give them an opportunity to reconsider the decision. You usually have to give them 14 days to reply.

I have missed my Review deadline

If you have missed your opportunity to request a Review of a negative eligibility decision, you may be able to make a request “out of time” and the DARR team have a discretion to accept it.

Whether it is accepted is likely to depend on a number of factors.

We would suggest that you consider making an out of time Review request even if you have missed the deadline.

We think the likelihood that it will be accepted will depend upon:

- **How long was the timeframe for making the request?** For ARAP decisions, you have 90 days, which is quite a long time.
- **How much time has lapsed since the deadline passed?** Have you missed it by a few days or by many months? The longer the time that has passed, the more significant the reasons will need to be.
- **What was the reason that you missed the deadline?** Was it because you did not have access to your emails because you were detained, unwell, in hiding and did not know about the decision? Was it because you were not able to connect to the internet reliably to submit the form? Or was it because you forgot?

Please note: it is unlikely that not being able to get legal advice, on its own, would be enough of a good reason for an out of time Review request.

To succeed in making an out of time Review request, you are likely to need to provide strong and supportive evidence for the reasons you were not able to make your Review request in time. For example, depending on the reasons you were delayed, you may have evidence:

- that you have been unwell (hospital records, doctors notes)
- that you were out of contact with everyone (for example, family members may be able to show that they were trying to contact you over a long period and unable to)
- that you have made the request as soon as possible, even though it is out of time

You should consider writing a witness statement to explain what happened.

If your Review request is not accepted and you believe that the decision is wrong, you may be able to challenge the refusal by judicial review. As we have already explained, this is a complex legal process and you should seek legal advice.

You will need to follow the pre-action protocol and the judicial review will need to be issued in court as soon as possible and no later than 3 months from the date of the refusal to accept your Review request.

I was resettled in the UK under ARAP. I applied for my family members but they were not accepted for resettlement. I am now worried about their safety, what can I do?

If you included your family members on your original ARAP/EGS application and received a negative eligibility decision, you will have had an opportunity to submit a Review request of that decision if you disagreed with it. As with Review requests for main applications, for additional family members you have 90 days to submit the Review request and it is via an online form.

In-time Review requests

If you have received a decision on your family's application within the last 90 days, you can submit a Review request. All of the advice we have given about the Review request for main applications applies to decision for your family members.

You should:

- explain why you think the decision is wrong:
- did the decision maker misunderstand your evidence?
- did they decision maker overlook some of your evidence?
- would providing more or new evidence help them to understand better?
- explain why you think your family are at risk or are exceptionally dependent on you
- explain any changes or updates to your family's situation

Important: It is advisable that, as well as submitting a Review request, you should make a subject access request to the Ministry of Defence for the decision minute. The decision should tell you in some detail why your application was not accepted but the decision minute will mean you can better understand why your case was not accepted. You should specifically ask for the decision minute and any other documents that have been used to decide your case.

Out of time Review requests

If you have received a decision on your family's application within the last 90 days, you can still submit a Review request. As with a Review the main application, when a request is submitted out of time, it will not be accepted unless you show that there were exceptionally compelling circumstances that prevented you from submitting it in time. We have explained what that might mean in relation to the main application and the factors will be the same.

The questions to ask are:

- How much time has lapsed since the deadline passed?
- What was the reason that you missed the deadline?

If, for example, your details were part of the data breach, you could argue that this is new information and you should be allowed to make an out of time request because you were not aware of the breach until recently: you could not have requested the Review sooner because you were not aware of the data breach.

I was accepted for resettlement in the UK under ARAP. I didn't apply for my additional family members. My data was breached and I am now worried about their safety, what can I do?

The government announced that from 5 June 2025, eligible principal applicants could submit an Additional Family Member (AFM) application within 30 days of the date they responded to their offer for relocation. This applied to individuals who received their eligibility decision before 5 June 2025.

Those 30 days have now passed and the government said that it would only accept applications out of time if there were exceptional compelling reasons it was not made in time.

However, if you now have reasons to be concerned that your family is at risk because of the data breach, you may wish to contact ARAP-Casework@mod.gov.uk and request a form for additional family members. You should set out in detail why your family members are now at risk, and why they were not included in your original application. You will need to explain why the data breach puts them at risk and provide evidence of any targeting or harm that has come to them.

I did not apply for ARAP myself but I was included in a family member's application. My family member was resettled in the UK but I was found ineligible.

If you did not apply for ARAP but had reasons to think you were eligible to do so, it is no longer possible to submit an ARAP application. There is no access to the online form.

If your family member's details were included in the data breach, it is possible that your details were also included. If you believe that you are now at risk as a result of the data breach, your relative may be able to request an out-of-time review of the decision that you are not eligible for assistance under the scheme. We would suggest that fact that you only found out about the data breach recently could be justification for why any Review request was "out-of-time."

I was resettled in the UK under ACRS Pathway 2 and I want to apply for my family members to join me. What can I do?

If you have been resettled in the UK under ACRS Pathway 2, you are someone who holds Protection (Refugee) Status.

Usually, your family members will have been resettled along with you if they were residing with you when you were accepted for Resettlement. However, if for some reason this did not happen, what you can do will depend on their relationship to you.

Immediate family members – your pre-flight partner and children under 18 years old at the time of the application – can apply to join you in the UK under [Appendix Family Reunion \(Sponsors with Protection\)](#) of the Immigration Rules. Your children over the age of 18 at the time of the application can also apply but need to show “exceptional circumstances” for why they must come to the UK.

Where you are unable to meet all of the Rules set out at Appendix FRP, you will need to provide evidence of compelling compassionate factors and that refusal would be unjustifiably harsh for the application to succeed.

Additional family members – all other family members – would either need to apply for entry clearance through:

- [Appendix FM: Family life with a partner](#) (post-flight partners)
- [Family life as a child of a person with limited leave as a partner or parent](#) (post-flight children coming with their other parent)
- [Paragraph 297: applications for a child to join a parent/relative with “sole-responsibility”](#) (post-flight children coming on their own)
- [Appendix Adult Dependent Relative](#) (Applicants over 18 years old)
- [Appendix Close Relative \(Sponsors with Protection\)](#) (Applicants under 18 years old)

The above applications all usually carry application fees and a requirement to pay the Immigration Health Surcharge unless you are granted a fee waiver.

The eligibility criteria also include knowledge of the English language (speaking and listening), financial requirements and that the sponsor can accommodate and maintain their family without needing government support.

Where you are unable to meet all of the rules and requirements, you will need to provide evidence of compelling compassionate factors and that refusal would be unjustifiably harsh for the application to succeed. **These can be complex applications and you would be best seeking legal advice.**

I was resettled in the UK under ACRS Pathway 3 and I want to apply for my family members to join me. What can I do?

If you have been resettled in the UK under ACRS Pathway 3, you do not hold Protection (Refugee) Status. However, usually as part of the process, your immediate family members (partner and children under 18 years old) would have been resettled with you. You were also able to apply for your additional family members to be resettled with you. However, if for some reason this did not happen, what you can do will depend on their relationship to you.

Immediate family members

Option 1: Family Reunion

You could try and apply under Appendix Family Reunion (Sponsors with Protection) but you are likely to face an initial rejection of your application because you do not have “Protection Status.” If this occurs, you may have to litigate (go to court) to get the UK to accept that you can apply on this route.

The benefits of applying on this route are that there is no application fee; your family members do not have to show that they can speak English; and you do not have to show that you can accommodate and maintain them. However, these benefits may be outweighed by the delays caused by litigation.

Option 2: Appendix FM and Part 8

Alternatively, if you are applying for your partner and children, you would need to make applications under Appendix FM, as [Family life with a partner](#) and [Family life as a child of a person with limited leave as a partner or parent](#).

If you are applying only for your children, the application would be made under [Part 8 Paragraph 297](#). You will need to show that you have sole responsibility for the child.

Additional family members

For additional family members, you would need to apply under:

- [Appendix Adult Dependent Relative](#) (Applicants over 18 years old)
- [Appendix Child Relative \(Sponsors with Protection\)](#) (Applicants under 18 years old)

As said above, these two route have many requirements. If you are unable to meet all of the rules and requirements you will need to provide evidence of compelling compassionate factors and that refusal would be unjustifiably harsh for the application to succeed. **These can be complex applications and you would be best seeking legal advice.**

Stay in touch!

- Please complete our [feedback survey](#)
- Subscribe to the APBI Newsletter

<http://eepurl.com/hZ5YtX>



Afghan
Pro Bono
Initiative

Additional information – useful but not part of the
Information Session on 19 August 2025

BEST PRACTICE FOR THOSE SUPPORTING AFGHAN CLIENTS

Advice for regulated and unregulated caseworkers

Best practice for those supporting Afghan clients

- Scope and Eligibility
 - Carefully check the remit for Immediate Family Members (IFMs) and Additional Family Members (AFMs). This varies route to route and/or type of immigration application and/or immigration status granted to the sponsor.
- Timelines
 - Deadlines
 - Further evidence and/or representations
 - Delays
 - ACRS
 - ARAP
 - Other applications

Best practice (continued)

- Expectations
 - Likelihood of IFMs: evidence and circumstances dependent, generally higher.
 - Likelihood of AFMs: evidence and exceptional circumstances dependent, generally lower.
 - Extensive delays are anticipated, up to 12 months is considered reasonable by the court.
- Family members in third countries
 - Check whether there is a VAC/is it currently open.
 - Are there easy alternatives/financial means to travel to another VAC?
 - Do not travel until a decision is received.

Best practice (continued)

- Evidence
 - Documentary evidence - to demonstrate vulnerabilities, threats/risk and/or family relationship
 - Letters of support
 - GP records
 - Current/previous legal representative's documents
 - Financial evidence
 - Witness/personal statements
 - Self-help guides for ARAP and ACRS

Best practice (continued)

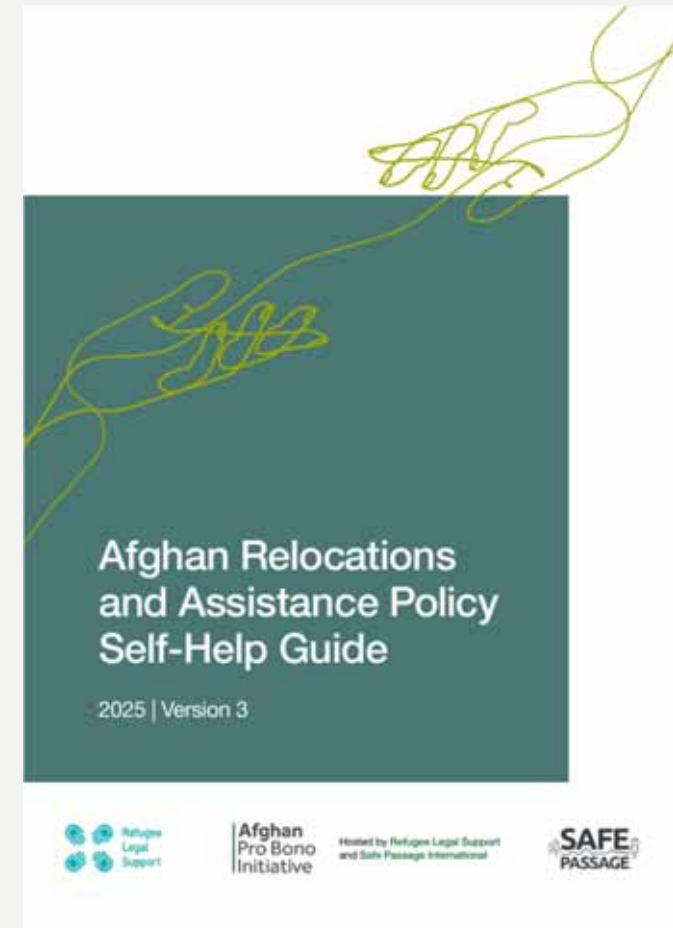
- Tips: what you can do if you are unregulated
 - Share publicly available resources - self-help guides etc.
 - Give general, non-personalised information on the routes / application process.
 - Help clients get forms, write emails to the Home Office or other third parties, and assist in send letters.
 - Apply for Section 4, 95, 98 support etc. for them - though you must not personalise the form or advise them how they can make themselves eligible.
 - Lodge an appeal against asylum support refusal ([ASAP has a helpful guide](#)).
 - Apply for travel documents or Exceptional Case Funding.
 - Contact the Home Office on their behalf to find out appointment dates / times, deadlines etc.

ARAP self-help guide

Key features of the updated guide are:

- Reflects updates on ARAP policy;
- Includes the latest ARAP Application form
- Covers updates on additional family members
- Includes examples of strong and relevant evidence to help applicants strengthen their applications;
- Explains how to submit a SAR for applicants who lack access to evidence of their work with the UK Government;
- Explains what to do if the application is refused.

It is available in English, Dari, and Pashto (see RLS website)



ACRS self-help guide

Key features of the guide are:

- This guide has been written as a resource to help Afghan nationals and their family members understand Separated Families Pathway under the Afghan Citizens Resettlement Scheme ('ACRS').
- Please note that the timeframe to submit expressions of interest has closed, but the guide remains useful for those who would like to submit referrals after the deadline (it explains how to do this).
- It explains about documents that are important to support applications.

The guide is available in English, Dari and Pashto.

