

Written evidence submitted by the Sulha Alliance

The **Sulha Alliance** was founded by former Afghanistan veterans and an academic specialist to campaign for and support former Afghan interpreters, other Locally Employed Civilians (LECs), who had worked for the British Armed Forces, and their families. The Sulha Alliance is the only organisation in the UK that specialises in supporting this community and has done so since 2016.

From the launch of the *Afghan Relocation and Assistance Policy* (ARAP) in April 2021, the Sulha Alliance has supported hundreds of former interpreters and other LECs with their applications.

Executive Summary:

- **PJHQ Planning Estimate for Uptake of ARAP and OP PITTING:** The initial estimated uptake on the Afghan Relocation and Assistance Policy (ARAP) was unrealistically low. It neither corresponded with the number of LECs employed nor with the number of applications eventually received or relocated.
- **Costly Delays:** The MoD missed several opportunities to safely resettle Afghan Interpreters, along with their families and other LECs *prior* to the fall of Kabul on the 15th of August 2021.
- **Incomplete Records and Inconsistent Figures:** The various records of the number of LECs employed by the MoD and information on numbers of interpreters and LECs relocated are inconsistent and incomplete.
- **ARAP Exclusions:** The ARAP criteria excluded several deserving and at-risk applicants. This was particularly evident in relation to those excluded, by policy, for default relocation to the UK.
- **ARAP Processes:** The capacity of the ARAP team did not reflect the urgent and rapidly evolving situation. Staff turn-over led to a lack of situational awareness.
- **Future Impact:** Both former LECs and current and former serving personnel express a strong sense of betrayal at LECs' treatment. This may impact on the willingness of a population to support the British Armed Forces.

Recommendations for Action:

- I. **Pre- and Post-Campaign Planning:** Locally employed personnel should be treated with the same dignity and respect as British personnel and not as second-class citizens. In future operations there must be comprehensive contingency planning for the evacuation of those who have supported us in a safe and effective manner. In the event of working alongside international allies, these plans must be coordinated.
- II. **HR Management of LECs:** Improve processes and protocols for employing, recording, managing and dismissing staff (both directly and indirectly employed by HMG) in order to ensure that archives are accurate and easy to interrogate, and to pre-empt and avoid the difficulties identified below in justifying dismissals and exclusion from resettlement.

- III. **Case and Enquiry Tracking:** The ARAP application and enquiry form must follow basic case processing principles and provide the applicant with a copy of their application details or query submitted. Including providing each applicant with a reference number for future correspondence and a clear checklist of steps in the process.
- IV. **ARAP Responsiveness:** ARAP applicants who submit applications and queries should receive a notification of the timeframe by which they can expect a response.
- V. **ARAP Appeal Procedure:** There should be a transparent and independent appeal process for interpreters and other LECs who have been excluded from relocation under ARAP based either on their disciplinary dismissal or on Home Office grounds. Rejected applicants should be informed of the incriminating details that are on their record.
- VI. **LECs still in Afghanistan:** The communication with those who remain in Afghanistan is currently limited to checking in with individuals but offers no direction on the MOD's plans for their extraction. Clear messaging from the UK government on its plans would allow individuals to prepare and the organisations who support them to provide value.
- VII. **Relocations from Third Countries:** A clear and robust pathway to access the support of Embassy or High Commission staff in third countries is necessary to prevent unequal treatment and to speed up the processing of applications and evacuation of LECs.

Evidence

Q: What estimate was made of the number of Afghan nationals who should be evacuated?

1. In April 2021, the Afghan Relocation and Assistance Policy (ARAP) was launched to replace the Intimidation Scheme for LECs, which the Defence Select Committee had already described in 2018 as "[hitherto useless](#)". The new ARAP scheme offered relocation to LECs to "[reflect the changing situation in Afghanistan](#)".

ARAP's [Equality Impact Assessment](#) (signed Feb 2021) stated that "[the MoD estimates that between 290 and 829 LES and their families might be relocated](#)" and that "figures **are likely to be nearer the lower boundary**". According to the Assessment, this number included "those in service with FCDO who would also become eligible to relocate".

2. The very **low estimate for the take-up of the resettlement scheme for Afghan nationals was entirely at odds with the number of Afghan interpreters that, by the Ministry of Defence's own admission, were directly employed by HMG**. The Secretary of State for Defence provided the figure of around [2821](#) for locally employed

civilian interpreters (June 2021). This still excluded privately contracted locally employed civilian interpreters who had worked for the MoD after 2014 (no figure publicly released).

In addition to interpreters, there are also Afghan Locally Employed Civilians who worked in various other roles. In September 2021, the Ministry of Defence quotes the figure of [4,013 for the total number of LECs](#) who worked for UK forces in Afghanistan, while by earlier accounts of the MoD there were [about 7,000](#) LECs (2018).

3. Until April 2021 only about 450 locally employed civilians had been resettled to the UK (under the already existing Ex-Gratia Scheme). **Hence the planning figure of max. 829 LEC fell significantly short.** It remains unclear why the planning figure did not correspond more closely to the remaining workforce.
4. Planning assumptions were even more unrealistic because **TF444 and TF333 interpreters were initially excluded from resettlement under ARAP**, because they were not directly employed by HMG. 444/333 interpreters were formally employed by the Government of Afghanistan (GOA) but then utilised by the UK-led TFs; 333/444 interpreters did not have Labour Support Unit (LSU) numbers and were therefore not included in the quoted numbers of LEC interpreters.

Q: What plans were made for the evacuation of Afghan nationals who had worked with or for UK Armed Forces?

1. Communications to ARAP applicants in April and May 2021 lacked any urgency and appeared to not anticipate the potential threat from the Taliban. A spirit of disbelief and distrust hampered the implementation.
2. Following the announcement of NATO withdrawal, Secretary of State Ben Wallace announced on the 1st of June 2021 that ARAP [“will accelerate the pace of relocations alongside the military withdrawal, including making more resources available to speed up the scheme”](#).

Up until that point [only 1 Locally Employed Civilian](#) had been relocated to the UK since the launch of ARAP.

3. On the 1st of June 2021, the Sulha Alliance and 16 partner organisations from 7 countries published a letter calling on governments to act urgently to protect Afghan LECs. The letter, also sent directly to Prime Minister Boris Johnson’s office, warns that [“time is running out to protect NATO’s local Afghan allies”](#) and calls upon the UK to [“act immediately to evacuate Locally Engaged Civilians \(LECs\) and their families to ensure that those that protected our lives will themselves be safe from reprisals”](#).

4. [On the 4th of June 2021, the Secretary of State for Defence refused to answer a tabled question](#) about the number of ARAP applications that his Department had received, which had been rejected, accepted or were still pending. It refused to release “details on timeframes or specific figures”, citing reasons of Operational Security.
5. The first ARAP flight to the UK only took place on 22 June 2021 (and included several ‘legacy cases’ of people who qualified under the extended Ex-Gratia Scheme).
6. On the 28th of June 2021, senior members of the veteran community, led by Lord Richard Dannatt, published an Open Letter which noted that [“far too many applications are being rejected despite the recent changes to the \[ARAP\] policy”](#).

Initially, **ARAP excluded all interpreters who had been dismissed** ([1010 out of 2850, i.e. 35% of the total work force](#)); this was changed in August 2021 to include those who had been dismissed for “minor offences”. It also excluded most contractors.

The former military chiefs’ letter also warned that [“time is of the utmost essence to save the lives of \[LECs\]. It is clear there is insufficient capacity for ARAP to cope with the scale and pace required”](#).

In a Times Radio interview on 22 August, Lord Ricketts elucidates his frustration that his warnings of the impending situation issued on 2 July gained no traction ([Lord Richards & Lord Ricketts Speaks to Charlotte Ivers on Afghanistan and More - YouTube](#))

7. According to information provided by the Secretary of State for Defence in September 2021, [“from the 1 April 2021 to 31 July 2021 approximately 6,500 completed, credible \[ARAP\] applications for relocation”](#) were received, of which [“approximately 3,500 applicants were rejected as a result of employment history, security concerns, and other complex factors”](#).

This amounts to a **rejection rate of 54%**. Between 1 April and 31st of July, [only 213 Locally Employed Civilians \(principal applicants\) were resettled](#) to the UK.

8. **Corrections to the ARAP policy were only reactively applied after political and media pressure** about harrowing cases.

For instance, the **British Embassy Kabul interpreters contacted the Sulha Alliance on the 18th of July 2021**, to ask for our support because they had been rejected from ARAP because they were subcontracted. We facilitated their contact with the media and only when [the Times](#) and [Daily Mail](#) covered their plight, they got included in the ARAP policy.

9. Communications to applicants in June and July 2021 appeared arbitrary, did not offer any explanation as to why an applicant had been rejected and were often delayed. There was no consolidated approach to the presentation of the letter; some used LSU numbers as a means of identification, some used names transcribed into English, some used ATAE numbers while others just said Sir or Madam. Dates on letters were not the same as the dates in the filenames and did not match the date that the email was sent to the applicant to notify them of the decision. This not only resulted in difficulties tracking individuals through the system but also resulted in unnecessary and costly delays.

Q: On which elements of the evacuation did the MoD lead or support and how effective was coordination with other Government departments?

10. The MoD led on the ARAP element of the evacuation, which proved to be bureaucratic and time consuming with constant confusion. Our data showed that those who were eligible for ARAP prior to Op PITTING and had submitted applications continued to wait for processing whereas those Afghan nationals who became eligible for relocation after the fall of Kabul were fast-tracked through the FCDO 'Leave Outside The Rules' (LOTR) system and were processed in a much shorter time frame and evacuated quickly.
11. **The support provided by FCDO and MoD to eligible Afghan nationals showed significant differences.** The FCDO utilised buses to transport those eligible to the airhead whereas the MoD relied on people to make their way through Taliban checkpoints and the chaos of the airport on foot, essentially channelling them into a killing area for terrorists, and disadvantaging them vis-a-vis FCDO personnel.
12. The **MoD-Home Office partnership was not sufficiently joined up**, as illustrated by several case studies that the Sulha Alliance has been made aware of.

Case Study 1: Applicant A was advised by Local Staff on 17 May to *"be prepared to relocate in as little as two to four weeks"* and to *"make all necessary personal, professional, domestic and financial arrangements you need to in Afghanistan to facilitate this"*. Hence, he sold his house and belongings. He received a letter on 10 Aug dated 02 Aug from the Home Office informing him that his application for a 5 year visa had been refused under paragraph 276BB1. Despite this, he still received letters calling him forward to the Baron Hotel for evacuation on 22 Aug, 23 Aug and 25 Aug but was unable to get through the crowds. He also received an email on 20 Sep (part of the data breach) stating that *"the ARAP casework team in the UK is doing everything it can to relocate you as safely as possible"*. The Sulha Alliance has been told by a MoD representative that the call forward was an error and that the Home Office rejection remains extant.

Q: How were plans for evacuation changed once the speed of the takeover by the Taliban became apparent?

13. Despite **clear warning signs that the situation was deteriorating fast, there was no appreciable change in the resourcing or tempo of operations from the ARAP application** teams until late July. It took the fall of Kabul on the 15th of August for ARAP to take any significant effect.
14. The initial screening by the ARAP team was only one step in a multi-step process, which was slow. It was also not comprehensively communicated to the applicants.

Case Study 2: Applicant *B* applied for ARAP and was accepted (12 May 2021). He finally received his call-forward (21 August 2021), but despite attempting to enter the airport with his family over a period of five consecutive days and nights, he did not make it on to a flight and has been left behind.

Case Study 3: Applicant *C* applied for ARAP and received an automated response on 7 May 2021. By 24 August 2021, he had still not received a response. He has been left behind in Afghanistan.

15. Communications to applicants in August 2021 **did not appear to recognise the speed with which the Taliban offensive was closing in on Kabul and were naive to the crippling impact it was having on applicants in the provinces that had already fallen in terms of their ability to carry potentially damning documents, apply for crucial passports and birth certificates, or travel freely.**

Whilst some emails inviting applicants to biometric testing stated that now only a tazkira was required, they still stated that passports, marriage and birth certificates were needed for the visa process (Emails dated 10 and 11 August 2021). Conversely, other emails inviting applicants to biometric testing stated that now only a passport was required (Email dated 24 August 2021).

Even on the day of the fall of Kabul, emails still stated that all members of the family must hold a valid identity document, without consideration that it was now almost impossible for applicants to apply or collect new passports.

16. Communications to applicants immediately before and after the cessation of Op PITTING flights potentially encouraged LECs and their families to embark on reportedly dangerous journeys to reach third countries to be processed and evacuated. When they arrived in third countries, some LECS reported that they were trapped near borders and unable to proceed to the embassies, or that they were unable to access the necessary help to continue the process when they reached an embassy or high commission, despite the FCDO Afghan Crisis Response automated email stating that *'Anyone in this group [accepted under ARAP] who is now in a third country can approach our Embassies and*

High Commissions for support in completing their application and their onward travel to the UK.'

17. **Communications from the FCDO Afghan Crisis Response from September onwards were automated, trite and the language was complicated.** The first 600 + words were more to absolve guilt than provide practical assistance - how hard they are working, how much Operation PITTING had achieved and how they were pulling every humanitarian and diplomatic lever to safeguard human rights.

The advice for ARAP applicants to contact colleagues from their unit (email 29 September 2021) was confusing and unrealistic because some Afghan LECs had had to destroy all documents linking them to the UK for safety reasons, and others had documents but the contact details for the units and people they had worked alongside were often hopelessly out-of-date. '

The UK's unpredictably short-notice and poorly communicated changes to ARAP eligibility criteria between April and August 2021 meant that some LECs, who had previously been rejected, had to resubmit their applications. In some cases, such as the case study below, the lengthy delay has meant that an applicant, his wife and their four children have now been left behind.

Case Study 4: Applicant D worked for nine years alongside UK Forces in Kabul. Local accusations that he was a 'spy' and an attack against him in 2014 prompted him to apply for resettlement under earlier relocation policies. He applied for ARAP but was rejected by default (25 June 2021) for dismissal. The applicant contested the reason for dismissal. He reapplied for ARAP and was accepted (14 August 2021), which left very little time to complete the necessary checks and receive a call-forward notification. His most recent email (26 August 2021) is simply titled '*Left behind and betrayed*'.

Q: How successful was the evacuation? Did it go according to plan?

18. Whilst the UK soldiers deployed on OP PITTING performed remarkably in an unbelievably challenging situation, the hitherto highlighted inadequacy of ARAP and earlier resettlement schemes (as highlighted by the high numbers of interpreters and LECs still in Afghanistan at the time of Op PITTING) created an almost impossible task for the deployed troops.
19. From the planning phase, the preparation of known vulnerable individuals for extraction ahead of Op PITTING could have been significantly better. There is little to suggest that archived information of employed LECs and those previously rejected from EGS was used to pre-identify and prepare high risk individuals and their families for extraction.

20. Meanwhile a large swathe of people became vulnerable when Kabul fell and were processed through LOTR (leave outside the rules), leaving ARAP applicants who had been recognised as at risk for years struggling to battle through immense crowds outside the Baron Hotel.

The UNHCR, the European Asylum Office (EASO) and the UK Home Office have long recognised the specific risk profile of LECs due to their association with foreign military troops: [“Personnel working for foreign military troops, in particular interpreters and security guards are seen as a top priority target by the Taliban”](#) (EASO 2019).

The fact that interpreters were funnelled through the ARAP scheme became an impediment to their extraction, as they remained at home waiting for a call forward message whilst other LOTR candidates flooded the Baron Hotel.

- a. This accounts for the high number of interpreters and LECs who were called forward but were unable to make it through the crowd, many of whom still remain in Afghanistan.
 - b. Similarly, this is evidenced by the fact that ARAP eligible interpreters and LECs (plus their families) constitute only a small proportion of the total number extracted during OP PITTING.
21. From our interactions with JSF command, troops expressed surprise when the location of Baron Hotel as the extraction point became common knowledge throughout Kabul and beyond, resulting in tens of thousands of people gathering at the site. The assumption that the extraction site would remain secret seems a somewhat naive oversight which undermined the ARAP call forward system. It cost 13 hours of valuable processing time as on day 2 of the evacuation, admissions to the processing centre had to cease whilst more robust crowd control measures were constructed.
22. According to JSF, only around 1 to 1.5% of those who were processed at Baron Hotel were rejected. Whilst this shows that the LOTR evacuees were exposed persons, the previously identified ARAP eligible candidates for relocation (who had applied for resettlement months earlier) now make up a higher percentage of those left behind than before the operation, adding to a sense of betrayal.

Case Study 5: Applicant E worked alongside the Royal Artillery as a driver for four years. He applied to ARAP at some point in late July 2021. He was called forward on 25 August 2021. He went with his family (including a three-month old infant) to the Baron Hotel, where they faced overwhelming crowds. *‘...i saw my former colleague they are waiting there from last three days, we have new born babies, children, women which are in really bad condition, we try to contact the phone numbers but we couldn’t reach...’* (Email dated 25 August 2021). The whole family was caught up in the suicide bomb attack on 26 August 2021. His wife and children were hospitalised with blast injuries while he

sustained a shoulder injury. By the time they were released from hospital, Operation PITTING had ended. There was no additional support or protection during Op PITTING for families, lone women or children to safeguard and ensure that the most vulnerable could be evacuated effectively and safely.

23. A particular frustration came on 25 August, when the Sulha Alliance gathered 15 eligible families at the back gate of Baron Hotel as requested; providing their names, details and pictures (to aid identification) to SJF, only for the gate to open once in a 24 hour period to admit just 3 individuals. Whilst operational reasons may well explain this, it remains a mystery as to why such opportunities were not exploited.

Q: How many Afghan nationals and families who worked with or for UK Armed Forces remain in Afghanistan?

24. If the information provided by the Secretary of State for Defence in September 2021 is correct that, "[from the 1 April 2021 to 31 July 2021 approximately 6,500 completed, credible applications for relocation](#)" were received, of which "[approximately 3,500 applicants were rejected](#)", the **remaining 3,000 who were not rejected should be a) either accepted or b) still in process.**

According to the Secretary of State for Defence the total number of LECs relocated between [April-August 2021 \(including Operation Pitting\) was 1194](#). Also by its own account, another [311 LECs are still left in Afghanistan](#).

This raises the question: **what has happened to the remaining 1495 LECs** who have applied to ARAP between the 1st of April and the 31st of July and were not rejected (3,000-1194-311= 1495), **but who have also neither been evacuated nor counted in the number of 'left behind' applicants?**

Note: this is only the number of ARAP applicants *until the 31st of July*, and it is reasonable to expect that after the 1st of August even more completed and credible applications for relocation have been received.

25. The Sulha Alliance is also in contact with 26 former Afghan interpreters (68 persons including dependants) **who were already resettled to the UK and hold UK visas but returned to Afghanistan and are now trapped there.** They had returned to Afghanistan to collect family members who had been waiting for visas to resettle to the UK since April 2019. In April 2019 the rules were changed to allow family members of interpreters who originally came to the UK unaccompanied to bring immediate family members to join them. Despite the rule change over two years before, family members were still awaiting resettlement and got caught up in the deteriorating security situation.

26. Security guards and other employees of Garda World were on their way in 13 buses to the HKIA airport when the explosion happened. This meant that they could not be evacuated. The Sulha Alliance received a list of 183 Garda World principal applicants still in Afghanistan on the 31st of August. Some of them had received Call Forward Letters while others had only been contacted by the MoD to confirm their identity. [The Sulha Alliance had already raised the issue of their plight of the security guards](#), including one whose father had received an MBE for his long-term service to the UK, on the 3rd of August.

Q: What can now be done to enable them to leave? What criteria will be used?

27. HMG either independently, or in co-operation with others needs to establish Humanitarian Corridors, to support extraction. They should be prepared to accept all who have a reasonable 'prima facie' case and then filter afterwards; the usual principle adopted in Non Combatant Evacuation Operations. It follows therefore that the UK needs to be generous and inclusive and, if necessary, be prepared to take risks on security. Those risks need to be explained and public consent developed, explaining that the humanitarian and moral imperative takes, on this occasion, precedence.

28. Embassies and High Commissions in key locations need support and instructions. The British High Commission in Islamabad appears to be overwhelmed and may require further resources to process claims. The delay is causing Afghan former employees to either remain in Afghanistan at extreme danger, or subsist in Pakistan without money or access to basics such as accommodation, food and water, for several weeks and months.

Q: What effect will the withdrawal have on future operations, and what will be the impact on the willingness of local personnel to work with, and support, the UK in future operations?

29. There is a broad sense amongst interpreters and former LECs of 'betrayal' and the expendability of people, as highlighted by the case studies below. Whilst this resembles similar sentiments following other conflicts, which has had seemingly little impact on the ability to recruit local personnel, a key change is the dramatic increase in global interconnectivity and communications. The plight of Afghan LECs is now well known globally, whereas the lamentable events which followed the Vietnam war for example are esoteric to historians. The ubiquity of mobile telecommunications and social media is likely to elevate the strategic risk to UK partnerships in future expeditionary campaigns if the UK is not seen to be honouring its moral obligations to the remaining LECs in Afghanistan.

Case Study 6: Applicant F worked alongside UK Forces but was rejected by ARAP by default (2 July 2021) for dismissal. It is not clear whether he knows why he was dismissed. *'I worked with British army I support them...now situation of Afghanistan worse they are not support us...now i m left behind...were is that human right UK government always talk about...what is my sin . When I worked with them I was good person... now I m bad...please what I did wrong...'* (Emailed dated 24 August 2021)

30. The rejection of LECs to the ARAP scheme for discretions as simple as arguing with an NCO after a series of challenging patrols (Applicant G - later evacuated by Denmark) has meant that some interpreters have been abandoned by the UK. The refusal to share with the LECs the reasons for their rejection has meant that many do not understand why they have been abandoned. This arbitrary and dismissive approach to people, many of whom risked their lives to support the UK's mission in Afghanistan, may not only reduce the willingness of local personnel to work alongside UK Forces in the future but may also cast doubt in the minds of some service personnel about whether they morally should employ LECs.

Case Study 7: Applicant H worked alongside UK Forces but was rejected by the Home Office (13 August 2021) with a generic explanation and no right to appeal or review. It is not clear why he was rejected after he was accepted via ARAP. *'...you just used us like dogs and tissue paper and throw us in dustbin.'* (Emailed dated 18 September 2021).

31. The disconnect between the ARAP team and the Home Office in terms of decision making and communication with applicants - the building of hope by one UK Governmental Department before a rejection by another - has meant that the approach has been disjointed. It has resulted in some interpreters selling their homes and packing up their lives because they had believed that they were being evacuated; in others, it has resulted in a sense of anger and rage.

Case Study 8: Former interpreter H (now in the UK, though whose interpreter brother remains in Afghanistan) - *"I wish me and my brother never worked for British Army, its absolutely a shame for this army to leave behind someone who stood with them when they needed help, the British army were announcing on TV in 2010 we need interpreter and labour. And know (sic) what they have done in return. Shame"*

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