

Mandates of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment; the Working Group on the issue of human rights and transnational corporations and other business enterprises; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on the rights to freedom of peaceful assembly and of association

Ref.: AL GBR 14/2024
(Please use this reference in your reply)

27 November 2024

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment; Working Group on the issue of human rights and transnational corporations and other business enterprises; Special Rapporteur on extrajudicial, summary or arbitrary executions and Special Rapporteur on the rights to freedom of peaceful assembly and of association, pursuant to Human Rights Council resolutions 52/7, 53/3, 53/4 and 50/17.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning the 2024 Emergency Tech Show, held in Birmingham during 18-19 September this year, where a British company participating in the event as an exhibitor, the Squad Group Limited, was reportedly filmed while demonstrating a body-worn electric-shock device called the Generated Low Output Voltage Emitter (the "G.L.O.V.E"). It reportedly also promoted online another similar device.

According to the information received:

The Emergency Tech Show in Birmingham, held every year in September, is the UK's largest exhibition for technologies and innovations in the emergency services sector.¹ The event is said to be attended by industry experts and technology enthusiasts alike, offering insights into the latest advancements and technologies driving transformation in emergency services.

On 18 September 2024, a British company participating in the event as an exhibitor, the Squad Group Limited, was reportedly filmed while demonstrating a body-worn electric-shock device called the Generated Low Output Voltage Emitter (the "G.L.O.V.E"). It reportedly also promoted online another similar device.

The G.L.O.V.E. appears to be a glove equipped with CD3 technology (Conductive Distraction and De-escalation Device), promoted as a tool designed to help law enforcement officers managing "difficult situations effectively and humanely."²

According to the company's website, "CD3 delivers small, non-lethal electrical pulses directly to the surface of the skin. These pulses target the

¹ <https://www.emergencytechshow.com/>

² <https://www.the-squad.co.uk/glove>

peripheral nervous system, quickly disrupting the sense of touch and causing temporary discomfort without causing harm. This process, called neuroperipheral interference (NPI), brings individuals into compliance in under three seconds without leaving any marks or scars.”³

The company is reported to be “in advanced negotiations to secure significant Government contracts that would not only validate [their] product but also position [them] as a key supplier for critical safety equipment. The contracts are expected to be a game-changer, with potential revenue streams.”⁴

In June 2023, representatives of the Squad Group allegedly appeared in photographs and videos demonstrating the use of the G.L.O.V.E. and other body-worn electric shock devices, to members of the Royal Gibraltar Police at a two-day seminar event held in Gibraltar, reportedly attended by officers from the UK police forces, UK Border Forces and officials from the Ministry of Defense.⁵

Without prejudging the accuracy of the above-mentioned allegations, we would nevertheless like to bring to your attention that the sale of direct contact electric shock gloves is considered incompatible with the absolute prohibition of torture and other cruel, inhuman or degrading treatment or punishment, set forth in article 5 of the Universal Declaration of Human Rights (UDHR); article 7 of the International Covenant on Civil and Political Rights (ICCPR), ratified by the United Kingdom in 1976; and, at least, articles 1, 2 and 16 of the United Nations Convention against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (CAT), ratified by the United Kingdom in 1988.

In this regard, we wish to refer to the 2023 thematic report of the Special Rapporteur on Torture to the United Nations General Assembly.⁶ The report is a thematic study on the global trade in weapons, equipment and devices used by law enforcement and other public authorities for law enforcement purposes, that are capable of inflicting torture and other cruel, inhuman or degrading treatment or punishment. It draws up a preliminary list of items identified by the Special Rapporteur on Torture as inherently cruel, inhuman or degrading and that, as such, are considered to be prohibited due to either (a) their technical specifications; or (b) because the purpose for which they are being used can be achieved by less harmful means.⁷

Certain “electric shock weapons”, in particular body-worn or direct contact electric shock devices such as batons, gloves and shields, fall within this category of prohibited items,⁸ owing to the excessive or unnecessary pain or injury that can be caused, and for which standard equipment is available.

³ Ibid.

⁴ <https://www.crowdfunder.co.uk/p/the-squad#start>

⁵ [Royal Gibraltar Police - News](#)

⁶ See A/78/324: <https://www.undocs.org/Home/Mobile?FinalSymbol=A%2F78%2F324&Language=E&DeviceType=Desktop&LangRequested=False>.

⁷ See Annex I, Category A Goods: Prohibited Equipment that is Inherently Cruel, Inhuman or Degrading: <https://www.ohchr.org/sites/default/files/documents/issues/torture/sr/annex-i-document-august-2023-ae-18-09-23.pdf>

⁸ See A/78/324 and Annex I, quoted above

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and any comment you may have on the above-mentioned information.
2. Please provide information on the measures adopted by Your Excellency's Government to investigate the above-mentioned information regarding the promotion and display of inherently cruel, inhuman or degrading devices at the 2024 Emergency Tech Show in Birmingham.
3. Please provide information on the measures adopted or envisaged by Your Excellency's Government in order to prohibit and prevent the exhibition and trade of the above-mentioned and similar devices in future trade fairs.
4. Please highlight the steps that your Excellency's Government has taken, or is considering to take, including policies, legislation, and regulations, to fulfil its obligations to protect against human rights abuse by business enterprises under its jurisdiction, and ensuring that business enterprises within its territory conduct effective human rights due diligence to identify, prevent, mitigate and account for how they address their impacts on human rights throughout their operation, as set forth by the UN Guiding Principles on Business and Human Rights.
5. Please provide any information in respect of discussions with the above-mentioned company or others in the same trade to ensure that their activities are in alignment with international human rights law.

We would appreciate receiving a response within 60 days. Past this delay, this communication and any response received from your Excellency's Government will be made public via the communications reporting [website](#). They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

Please be informed that a letter on this subject matter has been also sent to the Squad Group Limited.

In closing, we would like to respectfully call on your Excellency's Government to take a leading role in supporting the development of an international torture-free trade instrument aiming at complementing and reinforcing existing obligations to prohibit and prevent torture and other ill-treatment or punishment.¹¹

¹¹ On this, see recommendations formulated in A/78/324, quoted above

Your leadership also in the context of the larger Commonwealth would be very welcome. We remain available to discuss at your convenience.

Please accept, Excellency, the assurances of our highest consideration.

Alice Jill Edwards
Special Rapporteur on torture and other cruel, inhuman or degrading treatment or
punishment

Fernanda Hopenhaym
Chair-Rapporteur of the Working Group on the issue of human rights and
transnational corporations and other business enterprises

Morris Tidball-Binz
Special Rapporteur on extrajudicial, summary or arbitrary executions

Gina Romero
Special Rapporteur on the rights to freedom of peaceful assembly and of association

Annex

Reference to international human rights law

In connection with above alleged facts and concerns, I refer your Excellency's Government to the following applicable international human rights law and international humanitarian law provisions and standards:

Article 5 of the Universal Declaration of Human Rights (UDHR); article 7, read alone and in conjunction with article 2(3), of the International Covenant on Civil and Political Rights (ICCPR), ratified by the United Kingdom in 1976; and at least, articles 1, 2, 15 and 16 of the United Nations Convention against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (CAT), also ratified by the United Kingdom in 1988, which establish the absolute and non-derogable prohibition of torture or other cruel, inhuman or degrading treatment or punishment. Attached to such prohibition are obligations to criminalize and investigate all acts of torture or other cruel, inhuman or degrading treatment or punishment, to prosecute suspects, to punish those responsible and to provide remedies to victims.

The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment requires States Parties to take a range of preventive (prohibition and prevention) and reactive (investigation, prosecution and sanction) measures. This would include: "the adoption of legal and other measures to stop the production of and trade in equipment specially designed to inflict torture or other cruel, inhuman or degrading treatment or punishment falls within this general obligation to prevent acts of torture."

Furthermore, since 2002, Member States have reaffirmed their commitment to "take appropriate and effective legislative, administrative, judicial or other measures to prevent and prohibit the production, trade, export and use of equipment specifically designed to inflict torture or other cruel, inhuman or degrading treatment". This includes "material that has no practical use other than to be used for the purpose of inflicting torture or other [ill-treatment]".

The Committee against Torture has also repeatedly raised concerns about a range of items.

The United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules) prohibit "the use of chains, shackles and other instruments that are inherently degrading or painful." The rules require States to legally authorize the use of other means of restraint, to follow specific principles when using means of restraint such as those that are least intrusive, necessary and reasonably available to control the detainee's movements, and to provide training on the use of restraint techniques that would render the use of restraints unnecessary.

The Basic Principles on the Use of Force and Firearms by Law Enforcement Officials provide that law enforcement officials must be equipped with defensive equipment such as bulletproof and helmets, and that States carefully monitor the development and use of non-lethal incapacitating weapons.

Corporate responsibility for human rights violations is widely recognized and is becoming increasingly important. The Guiding Principles on Business and Human Rights recognize that state entities and businesses have a role to play in preventing and mitigating adverse human rights impacts.

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct provide for the integration of risk-based due diligence assessments into a company's risk management systems. In addition, the Guiding Principles of on Business and Human Rights state in the first principle that “States must protect against human rights abuse within their territory and/or jurisdiction by third parties, including business enterprises. This requires taking appropriate steps to prevent, investigate, punish and redress such abuse through effective policies, legislation, regulations and adjudication.”

In the context of peaceful assemblies, Law enforcement officials are obliged to exhaust non-violent means and to give prior warning if it becomes absolutely necessary to use force, unless doing either would be manifestly ineffective. Any use of force must comply with the fundamental principles of legality, necessity, proportionality, precaution and non-discrimination.¹⁰⁶ Domestic legal regimes on the use of force by law enforcement officials must be brought into line with the requirements enshrined in international law, guided by standards such as the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the United Nations Human Rights Guidance on Less-Lethal Weapons in Law Enforcement. (general comment No. 37 on article 21 (Right of peaceful assembly)).

All law enforcement officials responsible for policing assemblies must be suitably equipped, including where needed with appropriate and fit-for-purpose less-lethal weapons and protective equipment. States parties must ensure that all weapons, including less-lethal weapons, are subject to strict independent testing, and that officers deployed with them receive specific training, and must evaluate and monitor the impact of weapons on the rights of those affected. ¹¹⁴ Law enforcement agencies must be alert to the potentially discriminatory impacts of certain policing tactics, including in the context of new technologies, and must address them (general comment No. 37 on article 21 (Right of peaceful assembly))

The Model Protocol for Law Enforcement Officials to Promote and Protect Human Rights in the Context of Peaceful Protests, recommends governments to Develop clear guidelines on self-reporting for officials, including on the use of force and instruments of force, in line with the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the United Nations Human Rights Guidance on Less-Lethal Weapons in Law Enforcement, and on describing what occurred, when, where and why. A culture of accountability and transparency should be fostered, without fear of repercussions.

Besides, it indicates that governments and Law enforcement institutions need to take extra precautions to protect from harm individuals and groups in situations of vulnerability when using any force in the context of protests. This can include, for instance, giving additional considerations when using less-lethal weapons in the proximity of children, pregnant women, older persons, persons with disabilities, persons with intellectual or psychosocial disabilities and persons under the influence

of drugs or alcohol.

Government and Law enforcement institutions need to make all reasonable efforts to limit the use of and risks of less-lethal weapons with wide-area effects, such as tear gas and water cannons, which could cause a stampede or harm bystanders. Tear gas may only be used in response to widespread violence in a protest when it is not possible to contain the violence by more targeted measures against the violent individuals.