

**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 OTH 149/2024

(Please use this reference in your reply)

27 November 2024

Dear Mr. Conn,

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.

We are independent human rights experts appointed and mandated by the United Nations Human Rights Council to report and advise on human rights issues from a thematic or country-specific perspective. We are part of the special procedures system of the United Nations, which has 60 thematic and country mandates on a broad range of human rights issues. We are sending this letter under the communications procedure of the Special Procedures of the United Nations Human Rights Council to seek clarification on information we have received. Special Procedures mechanisms can intervene directly with Governments and other stakeholders (including companies) on allegations of abuses of human rights that come within their mandates by means of letters, which include urgent appeals, allegation letters, and other communications. The intervention may relate to a human rights violation that has already occurred, is ongoing, or which has a high risk of occurring. The process involves sending a letter to the concerned actors identifying the facts of the allegation, applicable international human rights norms and standards, the concerns and questions of the mandate-holder(s), and a request for follow-up action. Communications may deal with individual cases, general patterns and trends of human rights violations, cases affecting a particular group or community, or the content of draft or existing legislation, policy or practice considered not to be fully compatible with international human rights standards.

In this connection, we are writing to bring to your attention information we have received concerning the 2024 Emergency Tech Show, held in Birmingham during 18-19 September this year, where your company participated in the event as an exhibitor, and, was reportedly filmed while demonstrating a body-worn electric-shock device called the Generated Low Output Voltage Emitter (the “G.L.O.V.E”).

The Squad Group Limited

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.<sup>1</sup> The event is said to be attended by industry experts and technology enthusiasts, offering insights into the latest advancements and technologies driving transformation in emergency services.

On 18 September 2024, your company which participated in the event as an exhibitor, 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."<sup>2</sup>

According to your company's website, "CD3 delivers small, non-lethal electrical pulses directly to the surface of the skin. These pulses target the 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."<sup>3</sup>

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."<sup>4</sup>

In June 2023, representatives of your company 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.<sup>5</sup>

Without prejudging the accuracy of the above-mentioned allegations, and while recalling that all business enterprises rights have the responsibility to respect human rights and that this responsibility is independent of the State's own international obligations and exists over and above compliance with national laws and regulations. The United Nations Guiding Principles on business and human rights provide that to discharge their responsibility to respect human rights, businesses should conduct human rights due diligence.<sup>6</sup> We would like to note that the sale of direct contact electric shock gloves is considered incompatible with the absolute

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

<sup>2</sup> <https://www.the-squad.co.uk/glove>

<sup>3</sup> Ibid.

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

<sup>5</sup> [Royal Gibraltar Police - News](#)

<sup>6</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)

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.

Within this context, we wish to bring to your kind attention the 2023 thematic report of the Special Rapporteur on Torture to the United Nations General Assembly.<sup>7</sup>

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.<sup>8</sup>

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,<sup>9</sup> owing to the excessive or unnecessary pain or injury that can be caused, and for which standard equipment is available.

Both the European Court of Human Rights and the European Committee for the Prevention of Torture have expressed “strong reservations” about the use of electric shock equipment in direct contact mode, noting that “properly trained law enforcement officers have many other control techniques available to them when they are in touching distance of a person who has to be brought under control”.<sup>10</sup>

For these reasons, the Special Rapporteur on Torture included such items in her list of prohibited goods, and called for their discontinuation by all UN Member States. We consider their use, development, production and marketing, including exhibition, incompatible with international human rights law.

The Special Rapporteur’s list has been carefully assembled with the view to counter the absolute prohibition on torture and other cruel, inhuman or degrading treatment or punishment, and ultimately to ensure that all persons who come into contact with law enforcement for whatever reason are treated with dignity and humanity, while allowing the police and other law enforcement authorities to carry out their functions effectively and safely.

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<sup>7</sup> See A/78/324:  
<https://www.undocs.org/Home/Mobile?FinalSymbol=A%2F78%2F324&Language=E&DeviceType=Desktop&LangRequested=False>.

<sup>8</sup> 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>

<sup>9</sup> See A/78/324 and Annex I, quoted above

<sup>10</sup> See, for example, Anzhelo Georgiev and Others v. Bulgaria, Application No. 51284/09, Judgment, 30 September 2014, para. 76; European Committee for the Prevention of Torture, CPT Standards, “Substantive sections of the CPT’s General Reports” (CPT/Inf/E (2002) 1 – Rev 2015), p. 111, para. 7

This list can be found in Annex 1 of the Special Rapporteur on Torture's report, which sets out the list of her 20 prohibited items at: <https://www.ohchr.org/sites/default/files/documents/issues/torture/sr/annex-i-document-august-2023-ae-18-09-23.pdf>.

Under the UN Guiding Principles on Business and Human Rights all business enterprises have a responsibility to respect human rights, including that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandate entrusted to us by the Human Rights Council, to seek your cooperation in clarifying the facts that have been brought to my attention, we would be grateful for your comments on the following points:

1. Please provide any additional information and any comment you may have on the above-mentioned information.
2. Please provide information about the human rights due diligence policies and processes put in place by your company to identify, prevent, mitigate and remedy adverse human rights impacts of your activities, in line with the UN Guiding Principles on Business and Human Rights, in particular about specific due diligence or impact assessment measures taken by your company concerning the research and development, exhibition and/or sale of items included on the Special Rapporteur on Torture's prohibited list.
3. Please provide information on steps taken by your company to establish, or participate in effective operational-level grievance mechanisms, in line with the UN Guiding Principles on Business and Human Rights, to address adverse human rights impacts caused by your company throughout your operations globally.

As a company at the forefront of developments in police and law enforcement equipment, we count on your leadership and engagement on these issues and would welcome to meet with you at your convenience.

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.

Please be informed that a letter on this subject matter has been also sent to the Government of the United Kingdom.

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, we would like to highlight the UN Guiding Principles on Business and Human Rights (A/HRC/17/31), which were unanimously endorsed by the Human Rights Council in June 2011, are relevant to the impact of business activities on human rights. These Guiding Principles are grounded in recognition of:

- a. “States’ existing obligations to respect, protect and fulfil human rights and fundamental freedoms;
- b. The role of business enterprises as specialized organs or society performing specialized functions, required to comply with all applicable laws and to respect human rights;
- c. The need for rights and obligations to be matched to appropriate and effective remedies when breached.”

According to the guiding principles, States have a duty to protect against human rights abuses within their territory and/or jurisdiction by third parties, including business enterprises. States may be considered to have breached their international human law obligations where they fail to take appropriate steps to prevent, investigate and redress human rights violations committed by private actors. While States generally have discretion in deciding upon these steps, they should consider the full range of permissible preventative and remedial measures.

Furthermore, we would like to note that as set forth in the United Nations Guiding Principles on Business and Human Rights, all business enterprises have a responsibility to respect human rights, which requires them to avoid infringing on the human rights of others to address adverse human rights impacts with which they are involved. The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate. It exists independently of States’ abilities and/or willingness to fulfil their own human rights obligations, and does not diminish those obligations. Furthermore, it exists over and above compliance with national laws and regulations protecting human rights.

The principles 11 to 24 and principles 29 to 31 provide guidance to business enterprises on how to meet their responsibility to respect human rights and to provide for remedies when they have cause or contributed to adverse impacts. Moreover, the commentary of the principle 11 states that “business enterprises should not undermine States’ abilities to meet their own human rights obligations, including by actions that might weaken the integrity of judicial processes”.

The guiding principles have identified two main components to the business responsibility to respect human rights, which require that “business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; [and] (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations,

products or services by their business relationships, even if they have not contributed to those impacts” (guiding principle 13).

Principles 17-21 lays down the four-step human rights due diligence process that all business enterprises should take to identify, prevent, mitigate and account for how they address their adverse human rights impacts. Principle 22 further provides that when “business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes”.

Furthermore, business enterprises should remedy any actual adverse impact that they cause or to which they contribute. Remedies can take a variety of forms and may include apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition. Procedures for the provision of remedy should be impartial, protected from corruption and free from political or other attempts to influence the outcome (commentary to guiding principle 25).”