



Human Rights Guidance

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Preface and document control

This document is intended to provide information in respect of G4S Group Head Office policy, procedure, standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. This document **MUST** be reviewed and approved by the designated G4S Group Head Office approver(s) to ensure technical accuracy and business validity.

Document owner and approver(s)

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Top 350 managers and all employees	

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1.0. Our approach to human rights

1.1. Human rights context

G4S is committed to fulfilling its responsibilities on human rights in all of its companies around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011) across all of our businesses.

The Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

- The Universal Declaration of Human Rights (1947)
- The International Covenant on Civil and Political Rights (1966)
- The International Convention on Economic, Social and Cultural Rights (1966)
- The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

The G4S Human Rights Policy and Guidance have been developed to ensure that we respect the human rights of all stakeholders and prevent human rights violations arising from our activities whenever we can.

These guidelines are intended to help all G4S managers and employees to implement the G4S Human Rights Policy across the group.

1.2. Benefits of adopting human rights best practice

We believe that high standards of ethical conduct provide a market differentiator and those organisations with the highest ethical standards will have the most positive impact on the lives of those around them and ultimately, will be the most successful. Using human rights to guide our operations has several benefits:

Customers can be confident that they are working with a company which respects and operates to global human rights and ethical standards and will not compromise the customer's reputation as a result of unethical conduct.

Employees can be sure that they are working with a good company which respects their human rights and has a positive impact on society, through the services it provides and through the conduct of its people.

Partners and suppliers can be confident that any business venture entered into with G4S will be conducted on the basis of strong human rights and ethical principles and that any behaviour which is not in line with its policy and guidelines will not be tolerated.

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Shareholders can be sure that they have invested in a company which has a clear understanding of its obligations in respect of business ethics and human rights and is not subject to criticism regarding ethical or human rights issues, which could affect the company reputation, business performance or market/share price value.

Communities can be certain that G4S will have a positive impact on the local community in which it operates and will respect G4S as a “good” company which operates ethically and contributes positively to the human rights of the local community.



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2.0. Our human rights principles

2.1. Changing international expectations

Human rights are increasingly used as international standards for business performance. G4S, like other global companies, is being asked to explain and evaluate its business activities according to the law and language of human rights.

G4S plays a key role in societies all over the world and has developed a broad culture of high ethical standards and operational practices. Many existing G4S policies and procedures already take great care to ensure that we respect human rights. Our employment policies, professional standards and the due diligence we carry out to assess the suitability of new markets, products, business partners, and customers encourage respect for human rights.

2.2. United Nations guidelines

In July 2011, the United Nations approved a set of Guiding Principles on Business and Human Rights. Following consultation with independent experts and stakeholders, we have adopted these Guidelines as the basis of human rights monitoring and reporting throughout G4S.

The main principles of these guidelines are:

- The state has the overall duty to set and enforce laws and practices that protect the human rights of its citizens and population within its jurisdiction.
- Businesses have a responsibility to respect human rights in everything they do.
- Good human rights due diligence is the best way for businesses to ensure that they prevent actual or potential human rights abuses, and shape their businesses in such a way that they actively respect human rights.
- States and businesses share a joint responsibility to ensure that people have appropriate and effective access to remedy from business related human rights violations.
- In contexts where states fail to protect people's human rights, wherever possible and whenever this does not put our staff at immediate risk or bring us into dangerous conflict with local legislation, businesses should to operate beyond local law and custom by applying international standards.

These main UN principles are encapsulated by the term “**protect, respect and remedy**”.

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2.3. G4S and human rights

Within each G4S business, management must review the way in which our company policies and procedures are applied to ensure that G4S can not only prevent human rights violations but also how we can ensure that our businesses help people to enjoy the human rights to which they are entitled.

As a Group, we aim to abide by the UN Guiding Principles on Business and Human Rights to make sure that we are aware of any risks to human rights from our operations and act quickly to prevent or remedy them. Sector specific standards such as the International Code of Conduct for Private Security Providers and the Voluntary Principles on Security and Human Rights are already important benchmarks for G4S, and will continue to be embedded into the relevant parts of our businesses. Compliance with these standards enables us to reduce the risk of human rights violations in and around our businesses.

We should also recognise that in some cases our services are actively enabling people to realise their rights. For example, we offer security services that actively set out to protect people's rights to freedom of movement at airports, that protect people's rights to freedom of assembly at cultural and sporting events, or contribute to the realisation of their economic rights by moving cash safely and ensuring that they have access to their cash as and when they require it.

2.4. G4S core rights

The full list of human rights covered by the UN Guiding Principles on Business and Human Rights are listed in section 5.2. of this document. However, as a global security company, there are a number of specific human rights which are relevant to our operations – these are listed below:

- Life
- Liberty
- Security
- Due process
- Labour Rights
- Privacy
- Property
- Freedom of Movement
- Freedom of Expression
- Adequate Standard of Living
- Asylum
- Rights governing the use of force
- Rights protected under international humanitarian law

While we respect all human rights, we need to pay special attention to this group of rights in our due diligence processes because they are related directly to our role as a security company and our responsibilities as a large global employer.

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2.5. How could G4S violate human rights?

There are three main ways that a business can be involved with the violation of an individual's human rights.

- A company or employee could violate people's rights **directly** by abusive actions and policies.
- A company could be **complicit** in human rights violations by actively colluding in the violation of rights by states, partners, customers or any other parties.
- A company could also be involved with the violation of rights **indirectly** by its links to subcontractors or suppliers which abuse human rights as they support or act on behalf of G4S.

In human rights terms, violations can take place through an act of **commission** or **omission**. In other words, violations can occur by a company doing something it should not do, or by failing to do something that it should do.

For example, G4S could *commit* a violation of someone's right to life by using excessive force, or a person's right to privacy by operating overly intrusive surveillance. And, G4S could cause a violation by *omitting* to protect prisoners properly or by failing to offer an adequate duty of care to its employees.

2.6. How could G4S help to realise human rights?

In a similar way, G4S can help people to realise their rights directly, indirectly or in partnership with others. For example, G4S can directly protect people's lives. Or by providing a safe space, G4S can indirectly help people to realise many of their political, economic, social and cultural rights.

G4S businesses can also work in partnership with states to reform and improve public utility services and places of detention that help States to realise human rights.

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3.0. Practical Guidance for Managers

3.1. Knowing and showing

The main purpose of the UN Guiding Principles on Business and Human Rights is to enable companies to “know and show” the impacts of their businesses on human rights.

To do this effectively, each G4S business should monitor and respond to the human rights situation in and around its operations.

Responding to human rights risks and opportunities in an accurate, timely and effective way, and reporting on it, will mean that we can *show* how we have respected human rights.

The best way to “know and show” is to incorporate human rights due diligence into our existing business processes and to monitor compliance with our human rights standards and practices.

3.2. Human rights due-diligence checklist

Human rights due-diligence is simply a means of assessing our business activities and relationships in the context of human rights guidelines and best practice. The chart below provides some tips on how to prioritise your efforts:

Flashpoints	Make sure you have a good sense of the flashpoints in the context of your business and operations that could increase the likelihood of human rights violations
Identify Violation Risks	Identify potential violation risks and make sure you have policies and practices in place to avoid or mitigate them which are in line with group standards
Consult with key stakeholders	Seeking out and understanding people’s experience of G4S operations is an important part of assessing how well you are respecting human rights or whether there are any areas which can be improved
Conduct regular reviews	It is important to review your business on a regular basis against the G4S human rights due diligence framework - doing it once will not be enough to adapt to changing circumstances
Seek Advice	If you are in any doubt or need advice on human rights risks and mitigation, seek advice from colleagues or external human rights advisory groups
Share best practice	Many G4S businesses will face similar issues so share your experience and advice with others and respond quickly to requests for help from others
Focus on the positive as well as the negative	In some cases, G4S will be contributing to the realisation of human rights. For example, providing secure environments for people to enjoy daily life or providing education or training for young people in custody. You should promote good practice and your positive contribution to human rights where you can

3.3. Areas to consider in human rights due-diligence

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There are a number of key areas of business into which we should integrate human rights risk analysis into existing due diligence and business processes around our key stakeholder groups:

- Countries in which we operate
- Our relationship with our employees
- The responsibility we take for those who are in our care
- Our interactions with members of the public
- The approach that our partners and customers take to human rights
- The human rights track record of our suppliers

In addition, there are key human rights considerations which apply to the variety of services that G4S provides across its different markets.

The **G4S Human Rights Due-diligence Framework** provides an overview of the key issues to be considered, the relevant human rights which are applicable in each case and an overview of the key human rights due-diligence questions which should be addressed in order to satisfy ourselves that our business or operation is not contributing to any human rights violations.

The **G4S Human Rights Risk Assessment** (“heatmap”) document provides additional guidance for managers on the higher risk countries where G4S has existing operations or where G4S is seeking to enter a market. It highlights the issues to be aware of when carrying out human rights due-diligence in those countries and forms the basis of the priority list for our internal audit team on human rights issues.

This document is updated annually with reference to external sources of human rights and ethical analysis including:

- Freedom House
- International Centre for Trade Union Rights
- World Bank
- United Nations Development Programme
- Uppsala Conflict Data
- Transparency International Corruption Index

New countries of operation and major contracts are also reviewed by the Capex Committee, as part of the Group’s Capex approval process. The business analysis is augmented with a CSR Review process which looks at the broader issues in the political, economic, social, technological, environmental and legal areas and takes into consideration data collected from the sources listed above.

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4.0. Monitoring and accountability for human rights compliance

4.1. Accountability for human rights in G4S

Immediate responsibility for ensuring G4S respects human rights lies with all G4S management and employees.

Managers need to be familiar with the G4S Human Rights Policy and Guidelines. They must be able to demonstrate how they are actively preventing or responding to human rights risks and abuses, and how they are managing operations in a way which respects human rights or contribute to the realisation of human rights.

Each year, in conjunction with the annual review of the G4S Business Ethics Policy, managers will be asked to confirm that they understand the principles of the G4S Human Rights policy and guidelines and that they have adopted the guidance provided within their area of the business.

Ultimate responsibility for G4S's human rights performance lies with the Board of G4S plc who will actively ensure corporate accountability to the G4S Policy and Guidelines.

4.2. Effective Remedy for human rights violations

When human rights are violated by businesses, states are primarily responsible for ensuring access to effective remedy for those harmed in two ways:

- *Judicial remedy* under law and through the courts.
- *Non-judicial remedy* that involves more informal negotiated solutions between companies and communities, and often using mediation or NGO support.

G4S businesses have a responsibility to ensure that grievance mechanisms, complaints processes and access to remedies are included in operational procedures.

For state and business grievance mechanisms to be effective, the UN Guiding Principles on Business and Human Rights, require that they are legitimate, accessible, predictable, fair, transparent, coherent with the rights in question, a source of continual learning and improvement, and based on real dialogue with affected stakeholders.

As part of our overall approach to Business Ethics and anti-corruption we have a number of local and global reporting methods and processes in place which are open to all employees and other stakeholder groups.

All concerns reported by the whistleblowing reporting methods are reviewed by Internal Audit and where investigations reveal evidence of unethical conduct, disciplinary action is taken, which may range from a formal reprimand to termination of employment.

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4.3. Monitoring human rights compliance

Responsibilities

Immediate responsibility for ensuring G4S respects human rights lies with all G4S management and employees. Individual G4S business responsibilities include making human rights due diligence an essential and integrated part of their business processes, ensuring effective self-assessment and monitoring processes are embedded to ensure human rights policies and procedures are understood, and being complied with across the business.

Each year, in conjunction with the annual review of the G4S Business Ethics Policy, managers will be asked to confirm that they understand the principles of the G4S Human Rights Policy and Guidelines and that they have adopted the guidance provided within their area of the business.

The Regional Management team will ensure the G4S Human Rights Policy and Guidelines have been adopted across all businesses in the region.

Annual self-assessment for high risk areas

On an annual basis, a Human Rights Risk Assessment (“heatmap”) highlighting the highest risk business units and countries in which the group operates will be produced by the Group CSR Manager – this will include an overview of what the key human rights risks are in the highest risk countries.

On an annual basis, those countries which appear in the high risk category will carry out a self-assessment of their business practices in line with the G4S Human Rights Policy, Guidance document and Human Rights Due-diligence Framework.

The Regional Management team will ensure that the MD/CEO of each high risk business unit submits the completed human rights due-diligence checklist to the CSR Manager, within three months of the “heatmap” being distributed. A designated senior manager at regional level will oversee the implementation and completion of the human rights due diligence assessments across their region.

Any areas of concern raised during the self-assessment process will be followed up by the CSR Manager in conjunction with the Head of Internal Audit.

Non-high risk environments

All other businesses or countries which are not considered to be high risk will be required to incorporate human rights matters into their existing risk assessment processes.

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New country entries

All new country entries which are considered to be at risk of human rights or broader CSR challenges will be assessed against the group policies and a recommendation made to the Group Executive and CSR Committee as to the suitability of the country for a G4S operation to be established.

Audit

The human rights policy audit programme will be incorporated into all standard internal audits by reviewing the on-going implementation of the human rights policy and advising management on any potential areas of non-compliance so these can be rectified.

Internal Audit's human rights audit programme has been prepared to provide independent appraisal of management implementation and self-assessment processes for compliance with the human rights policy and guidelines.

This programme includes audit tests addressing the following areas:

- The implementation of new and revised Group policies and procedures related to human rights;
- Employee and management human rights training and awareness programmes;
- Confirmation of annual business ethics compliance statements signed by senior management;
- Implementation of employee confidential reporting hotlines; and
- Review of the submission of the self-assessed human rights due diligence checklist for all high risk countries or business units.

Internal Audit will ensure that countries and business units which are considered to be high risk will be subject to detailed human rights audits. It is envisaged that each high risk business or country will be audited at least once in any three year period.

High risk businesses or countries will be defined by the annual review of the Human Rights "heatmap" and findings from the standard audit programmes.

The detailed audit programme completed in high risk countries is designed to assess management's controls and monitor compliance. Any serious non-compliance will be reported to Executive Management and the CSR Committee.

The "heatmap" will be fully reviewed once each year, but will be continuously updated should events or conditions in countries evolve, raising the risk of human rights violations.

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5.0. Reference materials

5.1. The UN Guiding Principles on Business and Human Rights

G4S is committed to fulfilling its responsibilities on human rights in all of its companies around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011) across all of our businesses. The full text of these principles can be found online at www.business-humanrights.org/media/documents/ruggie/ruggie-guidingprinciples-21-mar-2011.pdf

These Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

UNDHR	The Universal Declaration of Human Rights (1947)	www.un.org/en/documents/udhr/
ICCPR	The International Covenant on Civil and Political Rights (1966)	www2.ohchr.org/english/law/ccpr.htm
ICESCR	The International Convention on Economic, Social and Cultural Rights (1966)	www2.ohchr.org/english/law/cescr.htm
ILO Declaration	The International Labour Organisation Declaration on Fundamental Rights at Work (1998)	www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm

5.2. Summary of human rights covered within the standards

Together, these standards establish the following rights as universal:

No.	Right	Notes
1	Right to life	Expectation not to be deprived of life indiscriminately or unlawfully and to have one's life protected.
2	Right to liberty and security (freedom from arbitrary arrest, detention, exile)	Prohibiting unlawful arrest, imprisonment or other institutionalisation.
3	Right not to be subjected to slavery, servitude, or forced labour	No one shall be subjected to forced labour - including bonded labour or involuntary prison labour
4	Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment	Entitlement to freedom from torture, inhumane and/or degrading treatment or punishment – including not being subjected to medical or scientific experimentation without consent.
5	Right to recognition as a person before the law	It is unlikely that the activities of a company would have any direct impact upon this right, though they may be complicit in the abuses of this right by others.
6	Right to equality before the law, equal protection of the law, non-discrimination	Expectation for all persons to be treated equally by the law without discrimination.

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No.	Right	Notes
7	Right to freedom from war propaganda	Prohibiting war propaganda and the support of national, racial or religious hatred that amounts to incitement to discrimination, hostility or violence.
8	Right to be free from incitement to racial, religious or national hatred	Prohibition of any national, racial or religious hatred that amounts to incitement to discrimination, hostility or violence.
9	Right to access effective remedy	Entitlement to have access to the courts and legal process.
10	Right to a fair trial	Expectation to a fair and public hearing by an independent and impartial tribunal.
11	Right to be free from retroactive criminal law	Prohibiting the state from imposing criminal penalties for an act that was not illegal at the time it was committed.
12	Right to privacy	No one shall be subjected to arbitrary or unlawful interference with their privacy, family, home or correspondence.
13	Right to freedom of movement	Everyone lawfully within a state territory shall have freedom of movement and the right to choose their residence.
14	Right to seek asylum from prosecution in other countries	Protecting people who seek asylum based on fear of persecution in their home country based on race, religion, nationality, membership of a particular social group, or political opinion.
15	Right to have a nationality	It is unlikely that the activities of a company would have any direct impact upon this right, though they may be complicit in the abuses of this right by others.
16	Rights of protection for the child	Children are recognised as being in need of special protection as required by their status as minors.
17	Right to marry and form a family	Including the rights of men and women of marriageable age to marry and start a family, and for marriage to be entered into freely and with full consent.
18	Right to own property	Everyone has the right to own property. No one shall arbitrarily be deprived of their property.
19	Right to freedom of thought, conscience and religion	Protects a person's freedom to choose, practise and observe his or her chosen religion or belief. The freedom also protects atheists and the right not to profess any religion or belief.
20	Right to freedom of opinion, information and expression	Entitlement to the right to hold opinions without interference includes the right to seek, receive and share information and ideas.

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No.	Right	Notes
21	Right to freedom of assembly	Entitles people to assemble and gather peacefully, subject only to the restrictions imposed by law as necessary to protect the interests of national security, public safety, public order, public health or morals, or the protection of the rights of others.
22	Right to freedom of association	Everyone shall have the right to freedom of association with others, including the right to form and join trade unions for the protection of their interests.
23	Right to participate in public life	Allowing people to take part in the conduct of public affairs and to freely choose representatives to perform governmental functions on their behalf – including free and fair elections.
24	Right to social security, including social insurance	The right to social security encompasses the right to access and maintain benefits from their government without discrimination.
25	Right to work	<p>Everyone must have the opportunity to make their living by work which they freely choose or accept. This implies that no one should be forced to engage in employment and that States must develop a system designed to guarantee all workers access to employment.</p> <p>The right to work includes the prohibition of arbitrary dismissal and workers should not be unfairly deprived of their employment. Work must be 'decent work' that respects their human rights including workers' rights regarding conditions of remuneration and work safety.</p>
26	Right to enjoy just and favourable conditions of work (including rest and leisure)	<p>Protect workers' rights to fair wages and equal remuneration for work of equal value, and that women must be guaranteed conditions of work that isn't inferior to those of men.</p> <p>Remuneration must also be enough to provide workers with a decent living for themselves and their families.</p> <p>Workers should also be able to expect healthy and safe conditions of work, a right to equality of opportunity for promotion, and a right to rest, leisure and holidays as part of conditions at work.</p>
27	Right to form trade unions and join trade unions; the right to strike	Everyone has the right to form trade unions and to join the trade union of his or her choice, subject to the union's own membership rules and possible restrictions by the state.
28	Right to an adequate standard of living	Everyone has the right to adequate housing, food, water and sanitation.
29	Right to health	Recognises the right to the highest attainable standard of physical and mental health.

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No.	Right	Notes
30	Right to education	Guarantees all children the right to free and compulsory primary education.
31	Right to take part in cultural life, benefit from scientific progress, material and moral rights of authors and inventors	In states in which ethnic or other minorities exist, the people belonging to those minorities shall not be denied the right, to form community with the other members of their group, to enjoy their own culture, to practise their own religion, or to use their own language.
32	Right to self-determination	The entitlement of peoples to have control over their destiny and to be treated respectfully.
33	Rights of detained persons to human and dignified treatment	Ensuring detainees are treated with humanity and respect, separating convicted from remand prisoners, separating juveniles from other detainees, and providing a regime that facilitates the social rehabilitation of detainees. 'Humane treatment' includes the provision of a minimum of services to satisfy prisoners' basic needs such as adequate food, clothing, medical care and means of communication.
34	Right not to be subjected to imprisonment in inability to fulfil a contract	The activities of companies are unlikely to impact directly on this right, but they may need to respond in cases where employees or other stakeholders are affected.
35	Rights of aliens to due process when facing expulsion	Ensures that foreigners who are legally present in a country are not expelled from that country without due process in accordance with the law.
36	Rights of minorities	Protects the rights of members of ethnic, religious or linguistic minorities to enjoy their own culture, to practise their religion, and to speak their language.

5.3. Internal resources

- G4S Human Rights Risk Assessment (“heatmap”)
- G4S Human Rights Due-diligence Framework

5.4. External resources

- **Human Rights Translated – A Reference Guide for Business**
http://human-rights.unglobalcompact.org/doc/human_rights_translated.pdf
- **Business and Human Rights Resource Centre**
www.business-humanrights.org/unguidingprinciplesportal/home
- **UN Global Compact: Human Rights**
www.unglobalcompact.org.uk/issues/human-rights/

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