



DE  
CON  
STRUCT

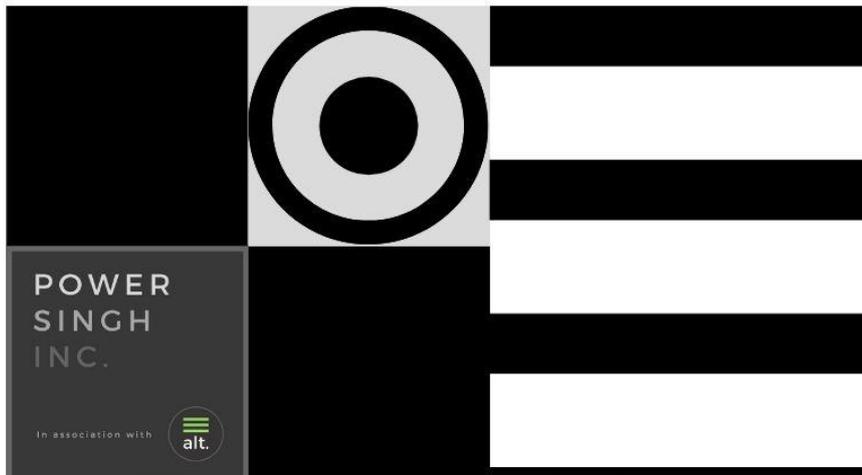
*A Power Singh Inc. Initiative*

# OGBV //

## ONLINE GENDER- BASED VIOLENCE

DECONSTRUCT //  
ONLINE GENDER-  
BASED VIOLENCE

*Toolkit*



POWER  
SINGH  
INC.

In association with





# **DECONSTRUCT // Online Gender-Based Violence**

## **OGBV**

### **Online Gender-Based Violence Toolkit**

**A Power Singh Inc. Special Project**

South Africa, 2021

This work is licensed under the Creative Commons Attribution-NonCommercial 4.0 International License. This means that you are free to share and adapt this work so long as you give appropriate credit, provide a link to the license, and indicate if changes were made. Any such sharing or adaptation must be for noncommercial purposes, and must be made available under the same share alike terms.

Full licence terms can be found at <http://creativecommons.org/licenses/by-ncsa/4.0/legalcode>

## ABOUT POWER SINGH INC.

Power Singh Inc. is a public interest law firm based in Johannesburg, South Africa seeking to ensure public and private sector accountability and the full realisation of fundamental rights and freedoms. Our mission is to offer legal services to underrepresented people and causes, to defend and develop the Constitution and the rule of law, and to ensure just and equitable outcomes for our clients. Visit [Power Singh Inc.](#) for more information.

## DISCLAIMER

Power Singh Inc. is a law firm registered with the Legal Practice Council (F18433), and a personal liability company registered in the Republic of South Africa (2018/071686/21). While Power Singh Inc., including its directors, employees, consultants, partners, and affiliates, has made every attempt to ensure that the information contained in this toolkit is up-to-date, compliant with the applicable legislation and regulations, and has been obtained from relevant and reliable sources, Power Singh Inc, is not responsible for any errors or omissions, or for the results obtained from the use of this information. These are explanatory toolkits and do not constitute legal advice.

# TABLE OF CONTENTS

<b>UNPACKING ONLINE GENDER-BASED VIOLENCE</b> .....	5
<i>What is online GBV</i> .....	6
<i>Examples of OGBV</i> .....	6
<b>LEGAL OPTIONS</b> .....	8
<i>What does the law say about OGBV?</i> .....	8
<i>Cybercrimes Act</i> .....	8
<i>The Domestic Violence Act (DVA)</i> .....	10
<i>Damages, crimen injuria, and the common law</i> .....	11
<i>Reporting OGBV</i> .....	14
<i>Protection Orders</i> .....	14
<b>TECHNICAL OPTIONS</b> .....	20
<i>Blocking content</i> .....	20
<i>Removing content and takedown notices</i> .....	21
<i>The law and takedown requests</i> .....	22
<i>Privacy settings</i> .....	23
<i>Reporting to intermediaries</i> .....	23
<b>PSYCHO-SOCIAL SUPPORT</b> .....	28

# UNPACKING ONLINE GENDER-BASED VIOLENCE

Gender-based violence (GBV) is a pervasive, systemic, and deeply entrenched reality for many. It can take on various forms and reflects the gendered and intersectional power inequalities that pervade society. Social norms, expectations, and problematic power imbalances mean that women, children, gender and sexual minorities, and vulnerable members of our communities face daily threats to their safety, dignity, and bodily integrity.

GBV is often associated with physical violence, however, it is important to remember and to recognise that GBV is not only a physical act. GBV covers a range of harm, violence, and abuse, which can include physical, sexual, psychological, or economic harm or suffering. It is also important to know that GBV can occur in a variety of spaces – both on- and offline. Bodies such as the United Nations Committee on Elimination of Discrimination against Women (CEDAW) have explained that—

“GBV occurs in all spaces and spheres of human interaction whether public or private, including in the contexts of the family, the community, public spaces, the workplace, leisure, politics, sport, health services and educational settings, and the redefinition of public and private through technology-mediated environments, such as contemporary forms of violence occurring online and in other digital environments.”

Online GBV, or **OGBV**, is another form of, and space in which, GBV occurs. It is not a distinct concept. In fact, “online GBV should not be seen as a separate phenomenon but as occurring on the continuum of GBV in society”. The harms that occur offline often continue, are replicated or are experienced online. Similarly, the harms that occur online often enable those that occur offline. OGBV is like any other type of GBV, and infringes on a victim or survivors rights, freedoms, and dignity and can have severe and long-term consequences.

In addition to the various forms and spaces of violence, it is necessary to view OGBV through an intersectional lens. Gender and gender constructs often intersect with other identities and expectations which can create distinct experiences of oppression or privilege. Therefore, as we unpack various understandings of and responses to OGBV we must remain mindful of the different identities and realities that inform our experiences and the experiences of others.

### **In short:**

- **GBV is not limited to physical acts of violence and is not limited to the offline world.**
- **OGBV is part of GBV, and is harmful, hurtful, and can have severe consequences for those affected by it.**
- **Harms that occur online often reinforce systems of oppression and violence that occur offline.**
- **Intersectional realities can contribute to unique experiences and responses.**

## *What is online GBV*

There is currently no uniform definition of OGBV, in South Africa, or internationally, but there are some evolving understandings of what the term means. Below are some helpful explanations:

- Pollicy explains OGBV is “an action facilitated by one or more people that harms others based on their sexual or gender identity or by enforcing harmful gender norms, which is carried out by using the internet or mobile technology. This includes stalking, bullying, sexual harassment, defamation, hate speech and exploitation, or any other online controlling behaviour”.
- The World Wide Web Foundation (Web Foundation) notes that OGBV “is a broad concept with a focus on the use of the internet/Information Communication Technologies (ICTs) to harm someone based on their gender identity.”
- The Association for Progressive Communications (APC) views OGBV as encompassing “acts of gender-based violence that are committed, abetted or aggravated, in part or fully, by the use of information and communication technologies (ICTs), such as mobile phones, the internet, social media platforms, and email.”
- The United Nations Special Rapporteur on violence against women, its causes and consequences, adopted a similar definition to APC, defining OGBV as “any act of gender-based violence against women that is committed, assisted or aggravated in part or fully by the use of ICT, such as mobile phones and smartphones, the Internet, social media platforms or email, against a woman because she is a woman, or affects women disproportionately”.

## *Examples of OGBV*

In addition to these explanations, there are some descriptions of what may constitute OGBV. Below is a non-exhaustive list of different online harms and violence that may assist in identifying OGBV:

- **Direct threats and/or violence:** This can include any act or threatened act of violence. It may be a direct or indirect threat to GBV. It may amount to intimidation which could include the sharing of content – for example in a message, email, or social media post – that conveys a threat that induces fear.

- **Surveillance, tracking and monitoring:** This includes the use of technology to stalk or monitor a person’s online and offline activities. It may include tracking locations, activities, and content. This may entail the real-time tracking of a person, but may also amount to historical monitoring of a person’s activities and behaviour. GPS or other geolocator software may be used to track a person’s movements without consent. Connected devices including a camera, microphones or audio speakers may be used to watch, listen to, or follow a person.
- **Controlling devices:** This relates to the access, use, or manipulation of a person’s electronic devices without their consent. This can be done in the presence of the person or remotely. For example, technological advancements have made it possible for people to control or manipulate the switching on and off of devices, the changing of temperature, and the locking and unlocking of spaces. This may be done to distort a person’s perceptions of reality, prevent them from using their devices, or prevent them from seeking assistance and support.
- **Malicious distribution / non-consensual dissemination of intimate image (NCII):** The use of technology to manipulate and distribute content without consent is a common form of OGBV. It may include the creation of fake content or a fake account, or it may include the non-consensual sharing of personal and/or intimate images or the non-consensual dissemination of personal and/or private information. This was commonly referred to as “revenge porn”, however this is misleading and problematic. [Maddocks](#) explains that NCII is neither revenge, porn, nor entertainment, and it oversimplifies a complex array of harms.
- **Intimate images/audio or video recordings:** This includes the non-consensual dissemination of a real or simulated image, sound, or video that is sexual or intimate. It is important to note that even if the content was initially consensually sent, if the distribution or manipulation of the image is non-consensual then it amounts to OGBV.

OGBV therefore, includes abusive conduct, and humiliates, degrades, and violates the dignity and sexual and bodily integrity of a person.

These examples are informed by several sources, including submissions by [APC](#) and a [multi-stakeholder collection](#) of civil society activists, technologists, policymakers, researchers, and feminists, as well as research by [Pollicy](#), the [Web Foundation](#), and [Amnesty International](#), and the report of the [Special Rapporteur](#).

While these explanations, proposed definitions, and examples are useful for our understandings of OGBV, it is important to recognise that technology is rapidly developing, which means that terminology and definitions are still evolving and may [change](#) as the development of digital technology and spaces gives rise to different and new manifestations of online violence.

# LEGAL OPTIONS

If you or someone you know has experienced OGBV, there are some legal options you may want to consider. This section unpacks relevant laws and reporting options.

Before turning to the various options, it is important to remember that pursuing a legal remedy is one of several options that you may want to consider. While the law is intended to protect and support you, and while the law can play an important role in preventing a person from committing further harm, our legal system is not always victim and survivor friendly. Some legal processes may take a long time, may cost money, and may not result in the outcome you want. While other legal processes may be more efficient and affordable, the process may still be overwhelming. Legal processes can also be triggering and result in further emotional and physiological trauma or harm. Pursuing a legal option is an inherently personal choice. Whether or not you choose to pursue a legal route should not have any bearing on the legitimacy of your experience.

## *What does the law say about OGBV?*

There is presently no clear legal position on OGBV in South Africa. However, South Africa's legal landscape is continually evolving. There have been some recent developments, such as the signing into law of the [Cybercrimes Act](#) 19 of 2020, and some anticipated developments such as the [Domestic Violence Amendment Bill](#) of 2020 which will likely provide various forms of protection in the context of OGBV.

### *Cybercrimes Act*

The [Cybercrimes Act](#) is South Africa's primary law that deals with crimes that occur online. It was signed into law by the President on 26 May 2021. It is important to note that the Act will only come into operation on a date determined by the President. This has not yet been done. This means that the protections of the Act will only kick in on the date set by the President. This toolkit will be updated to reflect these and other developments. However, and for the time being, the explanation below can still provide some guidance.

#### **Non-consensual intimate images:**

Chapter 2 of the Act specifically addresses cybercrimes and malicious communications and includes a specific provision on the sharing of NCII. Section 16 of the Act provides that a person who unlawfully and intentionally shares, by means of an electronic communications service, a data message of an intimate image of a person without their consent is guilty of an offence.

### ***Deconstructing section 16:***

- *It is a crime to share an intimate image of a person without their consent.*
- *The image must be a data message. A data message = content generated, sent, received or stored by electronic means.*
- *It must be an **intimate image** of a person which can be **real or simulated**.*
- *In order to amount to an intimate image, the image must **depict** a person as naked or showing or covering their genital organs or anal region, or their breasts if they are a female, transgender, or intersex person.*
- *The image must also **violate or offend the sexual integrity or dignity** of the person or amount to **sexual exploitation**.*
- *Any person who contravenes sections 16 is liable on conviction to a **fine** or to **imprisonment** for up to three years or to both a fine and imprisonment.*

Because this is a criminal offence, the Act envisages that such acts be **reported** to the **South African Police Service (SAPS)**.

### **A note on reporting cybercrimes**

As will be discussed below, reporting OGBV to the police may be a stressful, overwhelming or frustrating process. Some police officers may not consider OGBV to be a serious issue, and others may not yet be trained on the scope and application of the Cybercrimes Act. Unfortunately, the perception that GBV must be physical remains commonplace which may lead to the police, or other service providers not taking your complaint seriously. It is important to remember that GBV can manifest in many ways and that you are deserving of respect, protection, and support. While it may be difficult to remember, your experiences should not be invalidated or diminished by others. Therefore, if you choose to report an offence in terms of section 16 to the police, it may be helpful to take someone with you that you trust and who can support you through this process.

### **Additional protections**

Notably, section 20 of the Act provides additional protections to persons who report this to the police. A person who has been the victim or survivor of the non-consensual sharing of an intimate image may approach a Magistrate's court for a protection order while the criminal proceedings are underway. This means that the victim or survivor can get an order that prohibits **any person** from **sharing or resharing** the intimate image. It also means that a victim or survivor can get an order which requires the service provider hosting the image to **remove or disable access** to the image.

### ***Deconstructing section 20:***

- *The court must consider an application for a protection order as **soon as is reasonably possible**.*
- *The court will grant a protection order if it is satisfied that there is:*
  - ***evidence** that there has been the **non-consensual distribution of an intimate image**; and*

- there are **reasonable grounds** to believe that the image may be **shared or reshared**.
- The court may also grant a protection order if there are **reasonable grounds** to believe that the service provider must **remove or disable access** to the image.
- The court order will come into **effect** once it has been **received** by the person who shared or may reshare the image or is received by the service provider responsible for removing the image.
- The person or service provider who receives the order has **14 days** after receiving the order to give **reasons** to the court to set aside (remove) or change the order.

No further guidance has been given at this stage regarding the prescribed manner and form of these protection orders. These toolkits will be updated when there is further clarity.

### Steps to take

- If you or someone you know has had an intimate image shared online, which they did not consent to, they can **report this to SAPS** as a **crime** in terms of the Cybercrimes Act.
- If you are concerned that the image may still be online or maybe reshared you can approach the **Magistrate's Court for a protection order**. Remember, the protections of the Cybercrimes Act will only come into effect on the date determined by the President.

If a person is found **guilty** of disseminating an NCII, the court must, in terms of section 22(2) order:

- The person to refrain from disclosing or distributing the image.
- The person or any other person to destroy the image in question, any copy of the image and to submit an affidavit stating that the images have been destroyed.

The court can also order the removal of the image or that access be disabled.

### *The Domestic Violence Act (DVA)*

The Domestic Violence Act 116 of 1998 (DVA) seeks to provide victims and survivors of domestic violence with the maximum protection from domestic abuse that the law can provide. While not explicitly stated, the current definitions of abuse and violence could arguably be extended to include domestic abuse and violence that occur online.

In order to rely on the DVA, the violence must have occurred in the context of a **domestic relationship**. A domestic relationship is a relationship between two people which could amount to a perceived romantic, intimate or sexual relationship. The two people could be married, cohabitating, or are the parents of a child. The two people could also be family members. The DVA is used when the person committing domestic violence is **known to you**.

## Domestic Violence Act Amendment Bill

It is important to note that the DVA is currently undergoing an amendment process to include and expand certain definitions, and provide further clarity as to the manner in which domestic violence is addressed. The Domestic Violence Act Amendment Bill has been passed by the National Assembly and is before the National Council of Provinces (NCOP). The NCOP has invited members of the public to provide comments on the Bill. If the NCOP approves the Bill it will go to the President for his signature. The Amendment Bill incorporate some of the evolving understandings of online harms, and if passed, will likely assist victims and survivors of domestic violence that occurs online or is facilitated by ICTs. However, and at this stage, the DVA could still be used by victims or survivors of domestic violence that has occurred online.

### *Deconstructing domestic violence:*

*Domestic violence presently includes:*

- *Physical, sexual, emotional, verbal, psychological or economic abuse;*
- *Intimidation, harassment, stalking, damage to property, or entry into a person's residence without consent; or*
- *Any other controlling or abusive behaviour.*

*The above conduct must harm, or cause imminent harm to a person's safety, health, or wellbeing.*

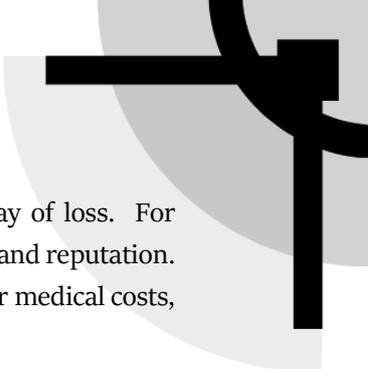
In line with the above descriptions and examples of OGBV, it is likely that the definition of domestic violence can be applied to conduct that occurs online.

## Steps to take

- If you or someone who know is in a domestic relationship in which domestic violence has occurred you may be able to rely on the DVA and **apply for a protection order**.
- It is necessary to note that the protection order provided for in the DVA differs from the protection order in the Cybercrimes Act.
- In terms of the DVA, a protection order can **prevent** an abuser from committing an act of domestic violence or getting help from another person to commit domestic violence.

## *Damages, crimen injuria, and the common law*

In addition to the legal options available in terms of the DVA and the Cybercrimes Act, you may want to consider a damages claim. A damages claim is a **civil remedy** that a person can turn to if they have **suffered a loss** as a result of the conduct of another person. A civil remedy is different from a criminal remedy, in that it seeks to repair loss or damage caused by another person's actions. A damages claim is often a claim for money to compensate a person for the harm they have experienced. This is an option that victims or survivors of OGBV could turn to.



OBGV is an insidious assault on a person's dignity and integrity and results in an array of loss. For example, the sharing of NCII could infringe on your personality, identity, dignity, privacy, and reputation. It may also cause severe trauma, pain, and suffering which may lead to you having to incur medical costs, for psychiatric and psychological treatment.

In order to prove that someone has caused you harm and that you should be compensated (paid) for the harm caused you will need to prove 5 things:

- **Conduct** – this is the action (or failure to act). For example, the **posting** of an NCII would be the conduct.
- **Wrongfulness** – the action must have infringed on a legally recognised interest or right. For example, the sharing of an image that you wanted to stay **private**.
- **Fault** (intention or negligence) – this means that the person can be blamed for the conduct. For example, **intentionally choosing to share** an image that was meant to be private.
- **Causation** – here there needs to be a connection between the action and the harm it caused. For example, you would ask, if the image had **not been shared**, would there have been an **infringement** of your rights?
- **Harm** – this includes the harm you have experienced; it may be as a result of your pain and suffering, or an infringement on your privacy. For example, the posting of an NCII of you could **infringe** your personality, identity, dignity, privacy, and reputation, and may you **cause pain and suffering**.

Unlike applying for a protection order – where you do not need lawyers – damages claims can be legally complicated and will require you to have **legal assistance**. This can cost a lot of money and can take a lot of time. The process requires several phases which can result in a trial. This process can be triggering as you may have to compile evidence, review evidence and be asked difficult questions by lawyers and judges. If this is an option you are considering it may be best to speak to a lawyer about it in more detail to get a better sense of what is involved. It is also important to have a good support structure throughout this process as the different stages may be challenging and overwhelming.

## Retaliatory defamation

It is important to note that while defamation may be an option for you, it may also be an option for a person who has been accused of abuse. The [Digital Freedom Fund](#) (DFF) records that “the global proliferation of #MeToo has been a stark illustration of the power of the internet as a platform for speech against sexual violence. Survivors continue to effectively use social media to speak out on their own terms”. In addition, there has been a rise in Informal “whisper networks” which are used to inform others about predators. While there is significant empowerment and agency associated with owning the narrative and sharing your story, regrettably, those accused of abuse are retaliating and are relying on the law of defamation to “inflict a considerable financial, temporal, and emotional toll on survivors, who are often forced to relive traumatic events and watch as their sexual lives are opened to scrutiny. The prevalence of these lawsuits may have a chilling effect on speech about sexual violence, and already widespread and underreported problem.”

In South Africa, a defamatory statement can be justified if the statement is true and in the public interest, or if the statement amounts to fair comment or freedom of expression. In addition to these defences, there have been some recent developments in South African case law that may become a route to consider for victims and survivors who face defamation claims by their abusers. The [High Court](#) recently grappled with the role of defamation proceedings as a means to silence activists. This type of conduct is referred to as a “SLAPP” suit - Strategic Litigation Against Public Participation. The High Court found that defamation cases that are used as a pretext to silence its opponents or intimidate, distract and silence public criticism and constitutes improper use of the judicial process. While this is a very recent development, it may find application one day in the context of GBV and retaliatory defamation.

If you are accused of defaming an abuser it may be helpful to reach out to a lawyer for advice.

There may also be scope to turn to South Africa’s *crimen injuria* laws which refer to the unlawful and intentional impairment of another’s dignity and have been applied to online activity in recent years. Additionally, there may also be common law protections that you could consider. Pollicy [highlights](#) that South Africa’s common-law offence of assault “includes not only physical impairment of another but also an act that inspires the belief or fear that such impairment is imminent,” which could be interpreted to include some forms of OGBV that result in threats to the physical integrity of a person. It may be best to speak to a lawyer about these options.

# Reporting OGBV

## Protection Orders

As noted above the Cybercrimes Act and the DVA provide for protection orders. A protection order is a **court order** from a **Magistrate** that can assist in protecting you against further harm. This section gives some guidance on the process for obtaining a protection order. Before turning to the steps, it is important to recap the differences between the Cybercrimes Act and the DVA in the context of OGBV:

Cybercrimes Act	DVA
<ul style="list-style-type: none"><li>• Protection orders can be sought if you are concerned that any person may <b>share or reshare</b> an NCII.</li><li>• Protection orders can also be sought if you want the NCII <b>removed</b> from an online platform – such as a social media platform.</li><li>• The purpose of this protection order is to protect you from further harm while the <b>criminal proceedings are underway</b>.</li><li>• Remember, in order to apply for a protection order in terms of this Act, you need to <b>have reported the crime to SAPS</b>.</li></ul>	<ul style="list-style-type: none"><li>• Protection orders can be used to prevent a person from committing <b>further acts of domestic violence</b>.</li><li>• Protection orders can also be used to prevent a person from getting help from others to commit acts of domestic violence.</li><li>• <b>Do not need to report the domestic violence to SAPS</b> in order to apply for a protection order.</li></ul>
<p>The process for protection orders will likely differ between the two Acts. However, it appears that the prescribed form for protection orders in terms of the Cybercrimes Act has not yet been published.</p>	

Listed below is a guide on the steps to be taken when obtaining a protection order in terms of the DVA. This is based on the notice that should be provided to a complainant in a case of domestic violence.

### **Step 1: Report the complaint to a local police station**

- You may lay a criminal complaint at any SAPS against the person who has committed domestic violence. But it is not necessary to lay a criminal charge in order to obtain a protection order.
- It is important to keep in mind that reporting OGBV can be challenging as not everyone acknowledges the legitimacy of online harms. This process can be difficult, scary, and frustrating and the police may not always provide you with the support you need. It may be useful to take someone with that you trust.

### How should SAPS respond to a complaint?

- The police officer must take down sufficient details about the incident, and listen to your story. The police officer should not make you feel bad for reporting the incident, or make fun of you in any way, draw assumptions about what happened, or make you feel uncomfortable. You may request to speak to a different police officer if it would make you feel more comfortable.
- You may also request to meet with the police officer in a more private setting at the station.
- If you want to lay a criminal charge, the police officer must open a docket and register it for investigation.
- You must be informed of your rights and the available solutions. At this stage the SAPS member must give you the prescribed notice, it must be explained to you in a language you understand. The police officer must explain how to apply for a protection order.
- The police officer must help you to access suitable medical treatment and/or suitable shelter if needed and you can ask a police officer to go with you to fetch any personal belongings.

### What to do if a member of SAPS fails in their duties

- If the police officer does not assist you in an appropriate manner or refuses to assist you who can report the officer to the Station Commander.
- The complaint should be noted in the complaint's register, and include the name of the police officer, the date of the complaint and the details of the complaint.
- If you are not comfortable with how the complaints process was managed you can approach the senior management of the police station.
- You can also contact the SAPS Service Complaints Centre in your area to investigate the poor service you received.
- You can also use the IPID Toll-Free number to report police misconduct on 0800 111969.

### ***Step 2: Apply for a protection order at a Magistrate's Court***

- You can apply for a protection order at a Magistrate's Court against the person who has committed domestic violence. For purposes of the forms and engagements with the Magistrate, this person will be referred to as a respondent. You can approach a Magistrate's Court in the area where you live or work, or where the respondent lives or works.
- This process can also be intimidating and confusing and it may help to have someone with you that you trust and can help you with the application.
- At the Magistrate's Court, you can ask for **Form 2** or an application for a protection order. You can also get this from your local police station.
- You can apply for a protection order for yourself, but you can also apply on behalf of another person. In the form, you will need to provide details about yourself, either as the applicant or as a

- person applying on behalf of the applicant, the applicant, and the respondent. You will also need to provide details about the violence, and what conditions you would like in the protection order.
- Similarly to the police station, the clerk of the court should assist you and explain the process to you in a way that you understand. The clerk should not make you feel bad for reporting the incident or make fun of you in any way, draw assumptions about what happened, or make you feel uncomfortable. If you experience difficulties with the clerk of the court you can lay a complaint against them at the Department of Justice and Constitutional Development:
    - Tel: 012 315 1111 / 012 315 1998
    - Email: [victimcharter@justice.gov.za](mailto:victimcharter@justice.gov.za)

When filling out the form it may be useful to think in terms of the definitions in the DVA. Here are some questions that may help:

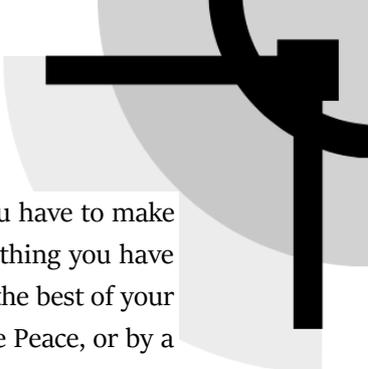
1. Is there a **domestic relationship**? What is the nature of the relationship?
2. Did the respondent do any of the following:
  - Physical, sexual, emotional, verbal, psychological or economic abuse;
  - Intimidation, harassment, stalking; or
  - Any other controlling or abusive behaviour?It is important to explain **what** the respondent did and **how** the respondent did these things.
3. Did the conduct of the respondent **harm** you or will it cause **imminent harm** to your safety, health or wellbeing. Explain why you feel you have been harmed or there is a risk of harm.
4. When considering what order you want, it is important to think about what it is you want the respondent to **stop** doing. This may be that the respondent must stop sharing images of you online or threatening you online, or you may want the respondent to stop controlling your electronic devices.

You can add supporting documents or evidence to the form. This could include details of the social media account on which the content was shared, or it may be access to the NCII that have been posted. **You should make sure that you always keep copies of this evidence, and make sure that you keep it safe.**

## Documenting OGBV

PEN America provides some useful guidance when it comes to documenting online harm:

- Although it may feel counter-intuitive saving content such as images, emails, messages, screenshots and hyperlinks can be hugely helpful for providing a record of what has happened, showing a pattern of behaviour, and proving the harm.
- To the extent possible, it is useful to keep a log of the OGBV which could include the date and time the incident occurred, the type of electronic communication, and the nature of the online incident.
- The documenting process can be emotionally draining and difficult. It is helpful to have support structures in place when you are working through this process.



After completing the form you must ensure that the form is **certified**. This means that you have to make an oath in front of a commissioner of oaths saying that you know and understand everything you have written in the application form. It means that you agree that what you have stated is to the best of your knowledge the truth. This can be done at a police station, at the courts by a Justice of the Peace, or by a Magistrate.

After the application has been completed and certified you must give the application to the clerk of the court. The court will then consider your application.

### ***Step 3: A magistrate considers the application***

Safer Spaces explains that the Magistrate, after considering your application, can do one of the following:

- **Dismiss** your application if there is no evidence that domestic violence is taking place.
- Grant an **interim protection order** to you, to be finalised on a later date provided. This may be to provide you with temporary protection, but also allow the respondent an opportunity to tell their side of the story.
- **Postpone** the matter without granting an interim protection order and provide a date when the respondent will get a chance to tell their side of the story.

### ***Step 4: An interim protection order may be granted and will be served on the respondent***

If the Magistrate gives you an interim protection order, this means you have temporary protection from the respondent. The clerk will tell you when your return date is and will give you a case number. The clerk will be responsible for making **copies** of the application and the interim order. You will then take the copies to the police or the sheriff to **serve** the application and the interim protection order on the respondent. It is necessary to note that the police cannot charge money for the service, however, the Sheriff may require payment.

The interim protection order will not protect you or have any legal effect until it is served on the respondent. The order will explain what conduct the respondent must stop doing and will explain when the respondent must return to court. If after being served, the respondent commits acts that are not allowed you can **report** the respondent to the police.

### ***Step 5: Court proceedings or hearing of evidence to determine whether a final protection order should be granted***

- You will be required to return to court on the date set out in the interim protection order, or in the postponement order of the court.
- If the respondent does not appear then it is likely that the interim order will be made final. If the respondent does arrive then the court will listen to your story and the respondent's story and any witnesses that may be necessary.
- You do not need a lawyer to accompany you to court, but if you want legal assistance you are allowed. If the respondent arrives with a lawyer and you do not have one, you may ask that the

matter be postponed allowing you to find a lawyer. The Magistrate should explain this to you and explain that Legal Aid can assist if you cannot afford a lawyer.

- When the Magistrate has heard everything they need to, they will take some time to consider whether or not to issue the order. This may be done immediately, or the court will break for a short time, after which the Magistrate will give their decision.

### **What is a hearing like?**

- The hearing should be held in private. This means that members of the public should not be in the courtroom when the hearing takes place. Lawyers, court officials, and witnesses may be in the courtroom.
- If there are lawyers involved then it is likely that the lawyers will do most of the talking, but the Magistrate may still ask you questions, and the respondent's lawyer may also ask you questions. If there are no lawyers then the magistrate will ask you and the respondents questions, and you will be required to answer truthfully. This will be your opportunity to explain what has happened and why you need protection.
- While these proceedings have been designed to be user friendly, it is still a courtroom, and can be an intimidating space. It is important to remain respectful of the Magistrate, answer the questions truthfully, and ask for clarity if there is anything you do not understand.
- As with interactions with other stakeholders, some Magistrates may not be familiar with OGBV. The hearing can be an important opportunity for you to link your case to the DVA and explain why you are in need of protection.
- As with all steps of this process, it may be helpful to you if you have someone there to support you.

### ***Step 6: Consequences for the respondent if they violate the conditions of a final protection order***

- Similarly to the interim protection order, it is an offence to breach the terms of a protection order. If the respondent acts in a way that is contrary to the order you may approach the police and file an affidavit explaining what the respondent has done.
- The police will arrest the respondent if there are reasonable grounds to suspect that you may suffer imminent harm as a result of the alleged contravention.
- If the police feel there are insufficient grounds for arresting the respondent they can still charge the respondent who will be required to return to court.

## Reflections on this option

Protection orders can be an effective way to secure protection. They can also be cost-effective as there is no need for lawyers. They are also structured to be time-efficient and are not meant to take as long as damages claims or trials.

While this option is set to be victim/survivor-centric, it is not without its challenges. The process may be stressful or triggering. You may not want to report the matter or have to fill out forms or appear in front of a Magistrate. It is also important to bear in mind that OGBV is an emerging concept for many people. Some police officers, clerks and Magistrates may not be familiar with online harms and may not take your matter seriously. That being said, this may change in time as the current amendment process of the DVA as well as the enactment of the Cybercrimes Act may lead to service providers being more receptive to these contemporary harms.

Whether or not you pursue this option it is your choice to make.

Here are some useful resources that may assist you if this is an option you want to pursue:

- Safer Spaces, [The Domestic Violence eBook](#)
- Women's Legal Centre, [A simplified guide to the Domestic Violence Act](#)
- The Government of the Western Cape, [Obtaining a protection order](#)
- Department of Justice and Constitutional Development, [Apply for a Domestic Violence protection order](#)
- Department of Justice and Constitutional Development, [Guidelines for the implementation of the Domestic Violence Act for the Magistrate](#)

# TECHNICAL OPTIONS

Legal remedies are not the only option available to you if you are a victim, survivor or have been affected by OGBV. Given the technical component of the harm, there are technical options that you may want to consider.

## *Blocking content*

The first, simplest, and most common steps that victims or survivors of OGBV can take is to **block** an abuser. [PEN America](#) explains:

“Limiting contact with an abusive account and limiting exposure to abusive content—via features like blocking, muting, and restricting—can help you protect yourself from unwarranted, inappropriate, or harmful conduct.”

Blocking can be effective in halting communication or abuse immediately and prevents the offender from continuing the harm through the same platform. In addition to blocking, you may consider muting specific abusive content or restricting how an abuser can contact you.

It is important to note that different platforms have different processes for blocking or muting. For example [Twitter](#)’s blocking feature “helps you control how you interact with other accounts on Twitter.” If you block an account on Twitter it means that user cannot follow you. The user will not receive a notification alerting them that their account has been blocked. However, if a blocked account visits the profile of an account that has blocked them, they will see they have been blocked. Twitter’s [help centre](#) provides guidance on how to block a Twitter account. [Instagram](#) also has an option for blocking or restricting other users on the platform. The Instagram Help Centre lists the various ways in which a person can be blocked and provides user friendly tips on how to control access to your platforms. For more easy access to the blocking processes of different social media platforms visit PEN America’s [Manual on Blocking, Muting, and Restricting](#).

### **The downside of blocking**

While blocking is an effective option and has become a common response to OGBV, it is necessary to recognise some of the problems associated with this response.

- Some abusers may get a sense of satisfaction when they are blocked, motivating them to find new ways to harm you online. They may even encourage others to target you. “Muting, hiding or restricting can provide [good alternatives](#) to blocking because abusers do not know that they’ve been muted, hidden, or restricted.”

- Pollicy explains that blocking is “not only another form of **self-censorship** and restrictions on the freedom of expression of women, but also the complete erasure of their digital identities and presence. This is further evidence for the fact that a single negative experience, or repeated adverse interactions, in online spaces can severely **impact the engagement and participation of women on digital platforms, leading in some cases to their complete absence**”.
- In addition to the above, blocking content may heighten your anxiety or may make you feel you are not in control. Therefore, the choice to block is up to you and what is in your best interests. It may be helpful to speak to friends or people you trust about your experiences and how you want to respond.

## *Removing content and takedown notices*

Another common response by victims or survivors is to **remove the offending content** from their **own accounts** and any other spaces over which they have control to do so. Although this may not completely remove the content from other online spaces, it can help create a safe space for the person and can be the first step to other complementary responses. This can be a helpful way for you to control your space and what you are exposed to. **Social media platforms** and other online spaces may also **choose to remove certain content** or **moderate the availability and accessibility of content**. This can be done when community standards are violated, or through the process of a takedown notice.

### **What are community standards?**

Community standards are the set of rules a social media company or platform puts in place to manage the behaviour and content on its platform. They serve as the yardstick against which the company will determine what content to remove or to allow on the platform, and serve to encourage a healthy, inclusive, and safe place for users to engage with each other.

### **What is a takedown notice?**

A takedown notice refers to “a company’s procedures for receiving reports that may come from customers, employees, law enforcement or hotlines that [offending] material has been discovered on the company’s networks or services, and for preventing further access and distribution.” Takedown notices are a vital tool for dealing with OGBV content as it happens, as well as preventing future occurrences on online platforms. If offenders know that their abuse is likely to be removed, it may create an incentive against posting it in the first place. However, and similar to some of the downsides of blocking, some abusers are motivated by how often their content is removed. However, it is your safety and your best interests that should inform your decision to pursue this option.

It is important to note that a takedown notice, even when received from law enforcement or other sources, does not necessarily mean a demand to delete content. It usually constitutes a request for the hosting company – whether a social media platform or other intermediary – to evaluate whether the

content is either illegal or against the platform’s terms of use in order to make a decision about removing it. In some circumstances, a company may need to keep the content online but isolate it from being viewed or circulated online, if it is necessary to maintain it for a criminal investigation or to identify victims of abuse.

## *The law and takedown requests*

There are two primary pieces of legislation in South Africa regulating takedown notices:

- The first is the **Electronic Communications and Transactions Act** 25 of 2002 (“ECTA”), specifically section 77, which provides a process to request the removal of unlawful content on a website. Usually, this is when a person alleges the content is unlawful either because the website is displaying their own information that they have not consented to display or where it infringes on copyright.
- Secondly, under the **Protection of Personal Information Act** 4 of 2013 (POPIA), South Africans may request the deletion of personal information hosted by another company. The primary ground on which a data subject will rely in such a request is that the information is “inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.” Companies hosting the information may, however, refuse to comply if they can provide credible evidence as to why it should not be removed.

For members of the Internet Service Providers’ Association (ISPA) – which includes many of the major internet service providers in South Africa such as Liquid Telecoms, MTN Business, Rain, Vox Telecom and Cool Ideas – requests can be lodged through ISPA by using the forms available here. ISPA requires that all its members have a Take-Down Notice process in place to allow for illegal content to be reported, and serves as a go-between for complainants and its members. Interestingly, the number of take-down notices issued through ISPA has increased exponentially over recent years.

Social media companies, apps, and other intermediaries will have their own processes for submitting takedown notices, which should be followed when seeking to remove OGBV material. These are detailed below.

### **What to do if the social media company is not responsive**

Firstly, you might consider reaching out to a wider community to request support reporting the offending content. The more people reporting a piece of content, the more likely it is to catch the attention of the platform.

You may consider reaching out to friends and family or finding like-minded online communities through the use of hashtags, groups or networking. If a social media company still does not respond to your request to remove content, there may be some legal options available to you. Consider approaching a lawyer to determine whether you may have a case.

## Privacy settings

To protect yourself in the online domain, there are also numerous steps that can be taken to control one's own digital sphere. This includes, for example, changing **privacy settings** to be more stringent, changing usernames or email addresses, or avoiding technology altogether.

Privacy settings can be used both as a pre-emptive step to prevent potential online offenders from being able to communicate online and as a reactive one after OGBV has occurred. Examples of the settings that one should consider reviewing include:

- Reconsider **location tagging, and location details in a social media bio**. Live location-tagging is particularly risky as it can enable real-world stalking.
- Depending on how a social media account is used, **restricting following** to approved followers only can be a useful tool – this can be done through changing your privacy settings. For those who use social media professionally, such as journalists, this may not be a viable option, and targeted blocking may work better.
- **Restricting comments**. This is applicable especially when posting controversial or sensitive content, and can be applied in a tailored manner only when necessary or as a blanket rule.
- Some social media apps also provide an option to **hide offensive comments** or to manually filter specific words or phrases, as well as to block comments from specific people.
- In particularly difficult or high-risk situations, you may want to consider what information about yourself is **publicly accessible through other peoples' accounts**, and potentially ask friends and family to remove information about you from their own accounts, such as tagged photos or other personal information.

## Reporting to intermediaries

Reporting practices differ by the social media platform. Here, we break down the reporting procedures for each of the most commonly used social media platforms in South Africa.

WHATSAPP	
<b>What is not allowed?</b> <ul style="list-style-type: none"><li>○ “Submitting content (in the status, profile photos or messages) that’s illegal, obscene, defamatory, <b>threatening, intimidating, harassing</b>, hateful, racially, or ethnically offensive, or instigates or encourages conduct that would be illegal, or otherwise</li></ul>	<b>How to report it?</b> <ul style="list-style-type: none"><li>○ On Android: go to WhatsApp &gt; tap More Options &gt; Settings &gt; Help &gt; Contact us.</li><li>○ On iPhone: go to WhatsApp &gt; Settings &gt; Help &gt; Contact Us.</li><li>○ You can also report a contact or a group from their profile information:</li></ul>

<p>inappropriate,” or that involves “publishing falsehoods, misrepresentations, or misleading statements” or “impersonate someone.”</p> <ul style="list-style-type: none"> <li>○ For more, see the “Acceptable Use of Our Services” section of the Terms of Service <a href="#">here</a>.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Open the chat.</li> <li>▪ Tap on the contact or group name to open their profile information.</li> <li>▪ Scroll to the bottom and tap Report contact or Report group.</li> </ul>
--	---

**How will they respond?**

- Because WhatsApp is an encrypted service, they do not have the ability to see the content of messages unless you have shared a screenshot of a conversation with them when reporting. It is therefore important to provide as much information as possible – to your level of comfort – when reporting to WhatsApp.
- It is also important to be aware that after you have reported contact or a group, WhatsApp receives the most recent messages sent to you by a reported user or group, as well as information on your recent interactions with the reported user.
- WhatsApp may ban users without notification, but reporting does not guarantee that a user will be banned. It is therefore important that in addition to reporting, a user takes their own precautions such as changing privacy settings or blocking a user, where necessary.

**FACEBOOK**

**What is not allowed?**

- Facebook will remove “content that depicts, threatens or promotes **sexual violence, sexual assault or sexual exploitation.**” They also remove content that displays, advocates for or coordinates **sexual acts with non-consenting parties to avoid facilitating non-consensual sexual acts.** To protect victims and survivors, they remove images that depict incidents of **sexual violence** and **intimate images** shared without the consent of the person(s) pictured.
- Facebook also provides [more detail](#) on other content that will be removed which includes sexual exploitation, NCII and threats.
- [Separate guidelines](#) exist for content related to child sexual exploitation, abuse and nudity.

**How to report it?**

- There are various ways to report content on Facebook. You can report a profile, a post, a message, a page, a group, a comment, an event or an advert, all of which have their own reporting process which can be seen [here](#).
- Facebook also provides tools and educational resources on [sexortion](#), and on [NCII](#).

**How will they respond?**

- Depending on the type of content and the type of complaint, Facebook will respond differently. In most cases, a number of prompts will be provided to guide you through the

type of complaint you seek to make. In some cases, this might also be followed by an opportunity to submit a report.

- Facebook also offers a [pilot program](#) to prevent NCII which enables anyone who is concerned about an intimate image being shared online to share the content privately with Facebook to enable them to prevent the images from being widely shared.
- Facebook will usually – though not always – alert you to the outcome of content you have reported, or at least thank you for reporting.

## INSTAGRAM

### What is not allowed?

- Instagram’s [Community Guidelines](#) state that it is “never OK to encourage **violence** or attack anyone based on their race, ethnicity, national origin, **sex, gender, gender identity, sexual orientation**, religious affiliation, disabilities, or diseases.”
- Instagram does not allow **nudity** on its platform, including content that shows “sexual intercourse, genitals, and close-ups of fully-nude buttocks. It also includes some photos of female nipples.”
- Users may not impersonate others or create accounts for the purpose of misleading others.
- Instagram follows [Facebook’s policy](#) on the sexual exploitation of adults.

### How to report it?

- Users of Instagram may [report](#) a post, a profile or a comment on the platform if it potentially contains OGBV, usually by clicking the three-button icon at the top of the post or profile.
- To report a comment, one should click on the comments icon, swipe left over the comment (iPhone) or tap the comment (Android) and tap the exclamation mark icon.
- One may also submit a [copyright report](#) if your images or content have been shared without your consent.

### How will they respond?

- After filing a report, Instagram will notify you through the Support Requests function (Profile > Menu > Settings > Help > Support Requests) on its status, and which will let you know, after it’s been reviewed, whether it violated the Community Guidelines.
- Usually, when content has been determined not to go against the Community Guidelines and has been left up, Instagram will provide you with another opportunity to request a review. If you disagree with the decision again, you may – only in some circumstances – be able to appeal to the Facebook [Oversight Board](#), although the Board only selects a small number of appeals to review.
- If your content has been removed and you believe it was done erroneously, Instagram may also provide an opportunity to request a review, but [not in all circumstances](#).

## TWITTER

### What is not allowed?

- Twitter Rules state that “You may not engage in the targeted **harassment** of someone, or incite other people to do so. This includes wishing or hoping that someone experiences physical harm.”
- “While some consensual nudity and adult content is permitted on Twitter, we **prohibit unwanted sexual advances** and content that sexually objectifies an individual without their consent.”
- Twitter does not permit impersonation, **manipulated media** or copyright violations.
- Finally, content “**depicting sexual violence and/or assault**” is also not permitted, as is private information or **non-consensual nudity**.

### How to report it?

- Anyone may file a report from a tweet, profile or direct message (including group messages), usually through the three-button icon at the top of the content.
- Multiple tweets can also be provided in a report, to help Twitter get all the relevant context necessary to understand whether the content is abusive.
- A user may request a review of the content of which they are the target or a bystander.

### How will they respond?

- After reporting, Twitter will provide updated emails and notifications on your case when Twitter takes action, although you may opt-out of receiving these. They may also request additional information from you.
- After submitting a report, Twitter will provide additional recommendations for actions you can take to improve your Twitter experience.
- Twitter evaluates the context of the content to determine the relevant consequences and penalties, including the severity of the violation and the person’s prior record of rule violations. Consequences may include removing the content, requesting someone to remove the content, making them serve a period of time in “read-only” mode, or – after repeated violations or if an account is engaging primarily in abusive behaviour – permanent suspension of the account. Twitter provides a range of other enforcement options.

## TIKTOK

### What is not allowed?

- TikTok’s Community Guidelines prohibit “**hateful behaviour**” which includes attacks on the basis of protected attributes such as **gender or sexual orientation**.

### How to report it?

- TikTok enables the user to report a live video, a live comment, a regular video or comment, a direct message, a user, a sound, a hashtag, or another issue.

- They will remove “all expressions of **abuse**, including threats or degrading statements intended to mock, humiliate, embarrass, intimidate, or hurt an individual.”
- Likewise, threats of doxing or blackmail are not permitted, nor is “**sexually exploitative content**” or impersonation, misinformation, or intellectual property violations.
- The Community Guidelines also prohibit “depictions, including digitally created or **manipulated content, of nudity or sexual activity.**”

- Usually, this is done by tapping “share,” long-pressing the piece of content, or clicking the three-button icon.

### How will they respond?

- TikTok will notify users of their decisions on reported content and users will be provided with the opportunity to appeal.
- Accounts and/or devices that involved in severe or repeated violations may be suspended or banned. TikTok states that they “consider information available on other platforms and offline in these decisions.”

# PSYCHO-SOCIAL SUPPORT

In unpacking the impact of GBV, [Safer Spaces](#) notes that:

“GBV is a profound human rights violation with major social and developmental impacts for survivors of violence, as well as their families, communities and society more broadly. On an individual level, GBV leads to psychological trauma and can have psychological, behavioural and physical consequences for survivors. In many parts of the country, there is poor access to formal psychosocial or even medical support, which means that many survivors are unable to access the help they need. Families and loved ones of survivors can also experience indirect trauma, and many do not know how to provide effective support.”

In an [interview](#) with Amnesty International, Director of [Online SOS](#), Samantha Silverberg explained as follows:

“There is little research examining the psychological toll online abuse has on individuals. Anecdotally, we can see the toll when individuals are fearful of opening their emails, unable to return to work, or are making other changes to their daily lives based on fears related to the abuse.

The lack of certainty around the practicality of threats made makes an individual that much more cautious as to how he or she interacts with the world around him or her. These threats do not just exist on the internet, they exist in reality, placing the threat anywhere due to this missing information on whether the threat simply exists online or may also exist in one’s physical world. This feeling of not-knowing is pervasive and can drastically change how an individual engages in society.”

## **It is your reality**

There is no right or wrong way to feel about your experiences of OGBV, they are your experiences and form part of your reality. There are no rules as to when you should experience certain feelings, and there are certainly no rules as to why you may want to respond in a particular way. There are no guidelines on how to react. As a victim, survivor or person affected by OGBV, you may feel different things at different times, and may need and what different types of support at different times. That is OK. No one should tell you how to feel, or how to respond. It is your reality, and it is your choice.



Engaging with the practical, technical, legal, social and psychosocial components or consequences of OGBV can be really hard. It can take a substantial strain on your wellbeing, and can have an arrange of effects on your mental and physical health. While you may feel isolated and alone, it may bring you some comfort to know that even though your experiences and your realities are your own, there are others who are facing their own realities who may be able to help, and there are people who care about you and can help support you in the ways you need.

Trained professionals, friends, families, or support groups can play a meaningful role in addressing the trauma, anxiety, and isolation you may be experiencing. Practically, they may be able to provide you with support as you consider various options you may want to pursue. They may be able to assist you with documenting evidence or finding additional support structures. They may fulfil a role as an emotional support structure, supporting you through the various phases and options as you determine what is best for you.

It may be the case that not everyone understands what you have gone through, and there may be some people in your life who cannot provide you with the support you need. But there is support, in a variety of shapes and sizes, that may be just right for you. Talking to someone you know may be comforting, but you may also prefer speaking to someone who does not know you. Here are some resources with access to contacts for organisations who may be able to help:

- Sonke Gender Justice, [Helpline Numbers](#)
- For Women, [Helpline](#)
- Department of Social Development, [Contact support](#)
- South African Government, [Organisation that offers assistance to victims of violence](#)
- SAPS, [Resource Centre](#)

In addition to the above, here are two different types of resources that you may want to consider as you reflect on the type of psychosocial support that you need:

## **rAInbow**

rAInbow is a South African AI-powered solution a provides a safe space for domestic violence victims and survivors to access information about their rights and support options, and where they can find help – in friendly, simple language. It can be accessed 24/7 via Facebook Messenger. Through the platform, you can take **Interactive Quizzes** that help confirm behaviours that are healthy and build your understanding of ones that are not. You can explore **Informative Content** about types of abuse and how to spot the signs. If you need help from a human, it'll signpost you. In addition, it provides You can read **Real-Life Stories** and **Scenario-Based Stories**, which helps you identify patterns of abuse or harm in your own relationships or those of their friends and family members. The stories are set to be relatable and may sound familiar, which helps victims and survivors understand that they are not the only ones experiencing violence or harm and that support is available, even though, at times, it can feel like an isolating and comfortless situation. It is important to note that rAInbow does not replace conventional psychology or reporting structures. While the platform does not focus explicitly on OGBV, it may be a useful space for you to explore.

## **HeartMob**

HeartMob provides **real-time** support to individuals experiencing online harassment and empowers bystanders to act. HeartMob allows users to easily **document** their harassment and maintain complete **control** over their story. Once documented, users will have the option of keeping their report private and cataloguing it in case it escalates, or they can make the report public. If they choose to make it public, they will be able to choose from a menu of options on how they want bystanders to support them, take action, or intervene. They are also given extensive resources including safety planning, materials on how to differentiate an empty threat from a real threat, online harassment laws and details on how to report their harassment to authorities (if requested), and referrals to other organizations that can provide counselling and legal services.

You may be fulfilling the role of providing support to someone else. If you are looking for ways to provide support to a victim or survivor, here are some resources that may help:

- Salochanee Reddy: [Support tools for gender-based violence survivors](#)
- PEN America: [Requesting and Providing Support](#)

### **Always remember:**

- **It is not your fault**
- **It is your choice how you respond**
- **You are not alone**



# DE CON STRUCT

*A Power Singh Inc. Initiative*

## POWER SINGH INC.

a 20 Baker Street, Rosebank, Johannesburg , South Africa  
t +2711 268 6881 | w powersingh.africa

