



DigitalRightsFoundation  
"KNOW YOUR RIGHTS"

## Updated Policy: Cyber Harassment Helpline

### 1: INTRODUCTION

#### 1.1 Digital Rights Foundation

The Cyber Harassment Helpline ("Helpline") is a project of the Digital Rights Foundation ("Organization"). DRF was founded in 2013, and is a research-based, advocacy organization that works on issues of accessibility, gender in tech, online free speech, privacy, and online harassment.

#### Cyber Harassment Helpline

The Helpline will provide free, safe and confidential service to victims and survivors who face harassment in digital spaces. The Helpline will operate on several channels, a toll-free number and email address. The Helpline was founded in December 2016.

The Helpline will provide services to complainants of **online harassment**, both recognised by the law as well as any other behaviour that the victim identifies as harassment.

The Helpline will consist of a toll-free number [0800-39393] where victims/survivors can call from across Pakistan in between the hours of 9 a.m. to 5 p.m. from Monday to Friday. During the Covid-19 pandemic, the Helpline staff will be available 24/7. The toll-free number will be accessible from 9 a.m. to 5 p.m. and will be available on virtual platforms 24 hours a day. The Helpline will not be on public holidays.

The services of the Helpline staff will be available on other platforms. The Helpline staff responds to complaints through our email address [helpdesk@digitalrightsfoundation.pk]. While our social media pages are open for complaints, however as per company policy social media companies' platforms are not the preferred medium for communication with complainants for reasons of privacy and confidentiality so complainants will be redirected to use the email address or helpline number instead.

The Helpline actively works towards providing support to marginalised groups in Pakistan, particularly gender and gender minorities who are disproportionately the target of online violence.

## Objectives of the Helpline

\*To EDUCATE our target audience to be informed, effective and empowered users of the internet;

\*To PROMOTE the Helpline as a resource for those who have questions or problems;

\*To AID those users who experience harassment or violence in cyber spaces;

\*To INFORM internet users about the legislative protections available to them;

\*To FACILITATE victims in finding the relevant psychological, legal and technical support that they need;

\*To ADVANCE the perspectives and rights of internet users into the mainstream and political dialogue around cyber harassment.

## Policy

The Policies contained in these documents will apply to the operations of the Helpline. These Policies are consistent with the ethics and principles of the Organization, and have been reviewed by the entire organization and its Board members.

The Policy is a living and evolving document, and will be subject to periodic revision and review by the Organization.

This Policy was last updated: **May 29, 2020**.

### 1.2 Ethics and Principles

Ethics and Principles of the Helpline are as follows:

- \* The **interests of the victims/survivors** shall guide every decision and their interests will have priority over the interests of the organization or community;
- \* The victim/survivor will have the **final say** in every decision affecting them. Every such decision shall be taken with their complete, affirmative and informed **consent**;
- \* Every interaction with victims/survivors shall be **confidential**, and measures shall be taken to ensure their right to **privacy**;
- \* Our aim is to educate and assist in a manner that will capacitate the victim/survivor as much as possible, so that they can take **independent, informed decisions**;
- \* We will provide our services **without discrimination** to gender, age, class, profession, race, ethnicity, caste, religion, sexual orientation and disability. We show **respect** for individual, religious, cultural and familial norms when dealing with victims/survivors;
- \* Protection, physical and mental **well-being**, of the victim/survivor shall be given the utmost priority;
- \* We shall have in place mechanisms and measures to ensure that the victim/survivor has access to consistent and quality service;
- \* It is our belief that **right to the internet** and online spaces is the right of every one, and that online harassment is a form of violence;
- \* We are committed to **open and free access to information**, however this does not clash with our commitment towards the absolute confidentiality of the victims/survivors we deal with.

## **2: SYSTEMS AND PROCEDURES**

2.1 The Organization shall ensure that the Policy is readily accessible, available, read and understood by all of its staff members. Furthermore, mechanisms will be developed and in place to ensure that the Policy is implemented and followed.

2.2 The Policy will be accessible to all its stakeholders, through the official DRF website. It will also be made available upon request.

2.3 All interactions with the victims/survivors shall be private, confidential and secure. Measures will be taken to ensure that clients are comfortable and safe when dealing with Helpline staff.

2.4 The Helpline will ensure, given the nature of online harassment cases, that the first point of contact is a female support staff.

2.5 The Helpline centre shall be in an enclosed space, separate from the regular operations of the rest of the Organization. The dedicated Helpline room(s) shall be accessible exclusively to the Helpline support staff. There shall be no distractions when the support staff is dealing with a victim so as to ensure confidentiality and quality service.

2.6 In instances of public emergencies, for instance a public health pandemic, or government imposed lockdowns, where it is impossible or a risk to host the Helpline at the office, the Helpline will take measures to shift to virtual/online platforms. Protocols for privacy, safety and confidentiality will apply to virtual settings well.

2.7 In instance of a situation as described in 2.6, if the Helpline staff is required to come to the office, strict guidelines as issued by the Helpline supervisor will need to be observed to ensure safety of the staff as they travel to and fro the office, and precautions to be taken at the office. In cases of public health emergencies, contact between staff members will be minimised through seating at a safe distance to prevent contagion, provision of personal protective gear and frequent sanitisation of helpline and office equipment. Sharing of Helpline headsets will be minimised and disinfected before sharing.

2.8 In case of scheduled suspension of services of the Helpline, such as on public holidays, notice of suspension of service shall be given in advance. There shall be a taped message on the Helpline detailing information regarding the closure, resumption of services and alternate avenues of contact during the period of suspension. In case of unplanned suspension, measures will be taken to place the taped message as soon as possible.

2.9 In case formal, legal charges are pressed by the victim and a case is pursued against the harasser, the Helpline staff shall provide guidance regarding the procedure of filing a complaint. The Helpline support staff shall also provide preliminary legal advice and inform the victim of possible challenges. The Helpline will provide referrals to the relevant law enforcement agency and, depending on its referral network in the area, shall direct the victim to lawyers or organizations that provide legal support in the area. If required by the complainant, the Helpline will follow-up on its referrals and keep track of how the case is progressing. The Helpline will not, however, provide representation or financial support to complainants.

2.10 The Helpline staff shall ensure that all digital communication and physical literature clearly displays the Helpline toll-free number. However to ensure that calls intended for the Helpline received on the Organization's other phone numbers are not heard by unauthorised personnel, all calls will be screened by the exchange device operated by Helpline staff, before being routed to its intended destination.

2.11 The Policies relating to data usage and informed consent, will change when the victim/survivor is a minor (under the age of majority, i.e. below 18 years old). A minor will not be assumed to have given informed consent, even if communicated by the minor himself/herself, and the Helpline will have a higher threshold to determine a minor's informed consent. In situations where the minor volunteers to obtain informed consent from their guardians, the Helpline will assess the situation to ensure that there is no exploitation or coercion. It shall be the policy of the Helpline not to share Personally Identifiable Information (PII) regarding minors and that unless it is to comply with the law, minors will not be encouraged to obtain informed consent from their guardians, nor will they be put in situations where informed consent is needed.

## **2.12 Helpline Support Staff**

2.12.1 The Helpline support staff shall be subject to these policies and they will be enforced as part of employment contracts. The job descriptions and employment contracts of the Helpline support staff dealing directly with the complainants shall include a section on the endorsement of these Policies.

2.12.2 The Organization shall ensure that all staff of the Helpline has undergone training. The training will focus on dealing with victims/survivors, counselling skills, self-care, gender sensitization, cyber security, cyber harassment, cyber law in Pakistan, law enforcement mechanisms, operating a helpline and simulation-based exercises.

2.12.2 Helpline staff members shall go be vetted for gender sensitivity and subject to a rigorous interviewing and selection process before being hired, given the highly sensitive nature of their job.

2.12.4 When dealing with victims of online abuse and harassment, the Helpline staff is directed to be non-judgmental and empathetic. The Helpline staff is also cautioned against imposing their own beliefs and preconceived notions of a situation onto the victim—the staff must play the role of facilitators, not controllers.

2.12.5 The Helpline staff must be aware of the different procedures and protocols of dealing with victims on different platforms of the Helpline. In case of service being provided over email, the email draft should be edited and confirmed by a total of two persons. If the email qualifies as an emergency or crisis case then email should be sent immediately, and review of the email should happen after the email has been sent.

2.12.6 For purposes of security and safety, the Helpline staff shall not disclose their real names on calls and will instead use “counselling pseudonyms”. The Helpline staff is not allowed to provide their personal contact information and are forbidden from replying to emails from their personal Organizational accounts. The Helpline staff is under strict orders not to disclose the location of the Helpline or the Organization.

2.12.7 Organization will provide adequate avenues for emotional support for the Helpline staff. Given the emotionally draining nature of their work, the Organization shall be mindful of the risk of burnout. Monthly supervisory sessions shall include a component on burnout and self-care. Separate sessions on stress management, de-briefing after difficult cases and mandatory leaves will be provided to the Helpline staff in order to ensure their mental well-being.

2.12.8 During emergency times when the Helpline is working remotely, regular check ins with the staff will be conducted to ensure mental well-being. We recognise that dealing with cases of violence and abuse while in isolation can negatively affect individuals. Counselling will be provided to support staff upon request.

2.12.9 The Helpline staff shall not discriminate between complainants based on their personal biases and all calls shall be dealt without prejudice. Helpline staff members shall not refuse service on the basis of any grounds that could be deemed as discriminatory as outlined earlier in the Ethics and Principles of the Helpline.

2.12.10 In cases where a communication received by the Helpline is abusive, offensive or threatening, it may be deemed appropriate for a helpline staff member to terminate the call (after following proper protocol i.e. after waiting for the caller to calm down and/or informing the caller that they should call back when they have their emotions in check and are better ready to talk etc.). A review of such calls shall

be done at the supervisory meetings, and the Helpline staff should be given adequate feedback on the best course of action in such circumstances.

2.12.11 In case of threats or legal intimidation against a Helpline staff member, the Organization shall provide appropriate support to the staff affected. The Organization is entitled to hold its internal inquiries to ascertain that there has been no impropriety on part of the staff member, however such an inquiry is required to be done with the utmost sensitivity and should not be used as an excuse to deny support to the staff member.

### 2.13 **Services and Referrals**

2.13.1 The Organization will develop an extensive referral system across the country, catering to the possible needs of the complainants. This referral system should be based on assurance of quality of service, gender-sensitive operations and capacity of the individual/organization to handle the complaint.

2.13.2 The Organization/Helpline will provide counselling, emotional support, and digital help to the complainants; for all extended services, such as legal help, in-person/phone psychological support, law enforcement action, shelter, law enforcement complaints, etc., the Helpline will refer the complainants to relevant local organizations. Referrals will be made keeping in mind the needs of the victim so they can be better facilitated. In case the referrals are charging a fee, the support staff shall inform the victim so they can make an informed choice.

While referral services will be checked for quality service provision, the Organization/Helpline will not be directly responsible for any transgressions on part of the external organizations and individuals. However feedback from the complainant will be taken seriously and the Helpline team will revise referral lists according to any negative feedback.

2.13.3 When deemed appropriate by the helpline staff, referral to DRF's roster of mental health counsellors will be made to callers to ensure their the complete well-being of the complainants.

2.13.3 It is the complainants' prerogative to not consult with the referral made by the Helpline.

2.13.4 The complainants will be referred to organizations/service providers after taking into account all quality, time, and financial concerns. In case a suitable referral cannot be made, the Helpline support staff should inform the victim of all risks and benefits of any alternative referral which may be pursued. Full disclosure of the kind of service that the victim may receive should be made in order to facilitate an informed decision.

2.13.5 After a referral is made, the Helpline support staff may conduct follow ups of the cases, both with the complainants and the service providers. This is to ensure that the victim is being facilitated with the highest quality of service that is needed for their particular situation, and so that the referral system drawn up by the Organization is constantly evaluated to maintain a certain standard. A time period between follow ups will be ascertained after discussion with the victim and the service provider.

If in the course of follow-ups it is revealed that the referral is unable to deliver quality services, then a reappraisal shall be done to remove them from the referral list.

2.13.6 If a case has been closed, but the Organization is still concerned about the victim, consent will be sought for the Organization to maintain contact with the

victim, to ensure their well-being. A mechanism for the follow up will be developed in coordination with the victim. If the victim is a minor, the consent of the parent/guardian shall be sought.

2.13.7 If more than one organization becomes involved in the victim's case, a joint effort should be coordinated with the objective of keeping the victim's best interests in mind over all others'.

2.13.8 For purposes of quality control, the Helpline staff might require the victim to participate in a quality control survey on calls and/or over email. The timing of these surveys will depend on the sensitivity of the situation, to be avoided when the victim is going through emotional disturbance. The consent of the victim shall be taken before beginning the survey and no Personally Identifying Information (PII) shall be required nor obtained.

#### **2.14 Supervisors**

2.14.1 The Supervisor shall be responsible for ensuring that the Helpline support staff abide by the policies of the Helpline and give victims their due rights.

2.14.2 Weekly supervision meetings shall be held with the support staff to discuss the problems and hesitations in each case. These meetings will adhere to the confidentiality policy outlined, and only non-identifying information will be revealed.

2.14.3 The support staff will also be held responsible in front of an external review team (comprising of a combination of experts and the Organization's board members on a rotational basis) to make certain that they are delivering the highest quality of service to those seeking help, and are abiding by the Organization's policies. The external review team may consist of experts and can also be called on for their assistance in line with the needs and problems faced by the Helpline.

2.14.4 In case the support staff's behaviour and practices are deemed inappropriate and are inconsistent with the official policy of the Organization, the Supervisor shall call upon the concerned staff member to provide a justification. The support staff member shall be reprimanded according to the degree of transgression, and in accordance with the Organization's Human Resource policy. Minor misconduct shall be reviewed at the monthly supervisory meetings, and if found inappropriate a warning should be issued to the party in question.

#### **2.15 Helpline Operations During Covid-19 Pandemic**

2.15.1 In light of the unprecedented measures being taken to minimize the Covid-19 pandemic, the Helpline shall be operating remotely to ensure there is no physical contact between Helpline support staff members to ensure their personal safety and that of their co-habitants. The policies governing this situation will be adapted for other emergency times as well, where similar measures are deemed necessary.

2.15.2 The Helpline will be open during work hours over virtual platforms such as the helpdesk email and official DRF social media platforms (DRF's social media platforms have been verified for this purpose). Privacy protocols will apply to these communications with complainants.

2.15.3 The toll-free number of the Helpline will be available through call-routing feature and received by a Helpline support staff member through a mobile provided by the Organisation. This mobile device will be protected through encryption and multiple layers of security. Only authorised Helpline staff will have access to the mobile device. The device will be operational strictly only during Helpline working hours. The mobile phone device will not be used for any personal communications.

2.15.4 All Helpline support staff will be required to report non-personally identifiable information regarding cases they deal with on a cloud-based MIS to ensure that there is coordination and adequate evidence of cases that are dealt with.

2.15.5 Any visits to law enforcement agencies or courts, to report or follow-up on cases, will be done only in strictly required cases. The concerned staff member will be required to take all social distancing and precautionary measures during their visit to the relevant office/court.

### 3: CONFIDENTIALITY

3.1 All **personally identifiable information** (PII) will be obtained and shared through **informed, active and withdrawable consent**.

3.2 The calls shall not be recorded under any circumstances and only authorised and trained Helpline support staff shall have access to the calls and email communication.

3.3 The Helpline has enabled CLI technology so that phone numbers of callers are displayed and callers can be contacted only in cases of emergency that involve physical safety of the caller. Phone numbers however are not retained or stored, either manually or automatically. In case the call requires follow-up, the Helpline support staff shall request the caller to call back at a later time. If the caller insists on the Helpline staff calling back, then phone numbers will be retained temporarily with explicit and informed consent.

3.4 All authorised actions on part of the complaint shall be taken through informed consent.

3.5 The complainants will not be required to provide the Helpline staff with photographic evidence (picture, screenshots, links to content, etc.). However, depending on the nature of the case, the Helpline staff can encourage the victim to maintain records and evidence. The Helpline staff shall guide the victim so as to store the evidence securely.

3.6 In cases where evidence is shared with the Helpline staff through informed consent, measures will be taken to store it securely. It will be ensured that only those staff members dealing with the case have access to that material. Such evidence shall be destroyed and permanently deleted once the case is marked as resolved within the Helpline tracking system.

3.7 Whenever there is a call relating to a sensitive matter that cannot be discussed over the phone, or if the complainant does not feel comfortable conducting the conversation over the toll-free landline number, then the Helpline Support Staff is required to redirect its conversation over a more secure mode of communication. The complainant will be directed to switch to the secure channel, i.e. Signal or Jitsi. Digital assistance will be given in cases where the victim is not familiar with these platforms. The Helpline Support Staff has a dedicated smartphone and number precisely for the purpose of more secure and confidential communications. Decision to switch to the more secure communication will be done after a risk assessment by the Support Staff, and in consultation with the Supervisor in more complicated cases.

### 4: DATA USAGE POLICY

4.1 The Helpline strives to give the callers choice and control over the information they share with us, and how that information will be shared. Our aim is to

communicate why the information is needed and what it shall be used for at the time of obtaining that information, in order to ensure maximum transparency. However in emergency situations or circumstances it would not be appropriate to communicate policies for counselling reasons, we will make sure that it is communicated as soon as appropriately possible.

4.2 The Helpline shall only collect non-personally identifiable information, and if personally identifiable information (PII) is needed for matters relating to the case then informed consent needs to be taken.

4.3 The information collected and recorded by the Helpline staff shall be limited to: age, location, gender, the nature of the complaint, duration of the call, number of calls and emails received number of cases resolved, number of calls attended by a staff member, feedback from callers (obtained through informed consent), how the victim found out about the helpline, number of cases referred and to whom and whether the victim/survivor received a referral. This list stands to be amended if the victim/survivor volunteers information through informed consent. Refer to media and publicity policy for specific policies in such circumstances.

4.4 When PII is volunteered the Helpline support staff may record some of the information for the purpose of adequately following and better analysis of the case. In such a circumstance, measures will be taken to ensure security of the information. The Helpline staff shall maintain the complainant's confidentiality by keeping their files in a separate and locked cabinet. It is our policy to destroy all PII, both physically and digitally, after the case is resolved.

4.5 The aforementioned information will not be shared with anyone outside the Organization, or non-essential members of the Organization. The Organization shall not rent or sell this information to third parties. We will not transmit or share this information unless required by law. In such cases we shall vigorously challenge any subpoena or other demand by government or private organizations or individuals to access this information.

4.6 Pertaining to the prior clause, a victim/survivor's information shall only be shared with external organizations, especially law enforcement and health agencies, without having obtained their consent if the support staff believes someone's life to be in danger or under threat. The threat may be to either the victim or someone else.

4.7 All information collected and stored in the course of communications, whether over email or through calls, will be subject to our confidentiality policy. It is the Helpline's policy not to backup data relating to these cases, and data is only retained till the case is resolved. Till this information is on our record we shall work to secure it both physically and digitally.

4.8 Non-personally identifiable information will be used for internal record-keeping, review and shared with donors. This information, though non-personally identifiable, will be anonymised to remove any data that might reveal the victim/survivor's identity indirectly.

4.9 If information needs to be shared with referral partners, it is the preferred policy that the victim/survivor should share the information and data themselves. Under exceptional circumstances, if the complainant is unable to share the information and authorises the Helpline to do so, this exchange can only happen when informed and express consent has been given. The victim shall be required to fill out a consent form before the transfer of information can take place, and should be made aware of



all the possible consequences of sharing the information. The victim/survivor will be updated on the status of the transfer at every point of progress.

4.10 The Organization might use certain cases as “cases studies” for academic, awareness-raising, fund-raising or advocacy purposes. The Organization shall be required to gain informed consent from the victim and/or survivor. The Organization will be required to take measures to ensure that the privacy of the victim is guaranteed at all times. It will be ensured that all personal identifying information is anonymised.

4.11 The Organization shall have in place measures to secure its communications and storage of data from breaches. External attacks on its communications shall be dealt with immediately and given the highest priority within the Organization.

#### **4.12 Media**

4.12.1 Case will be discussed with any media member or organization only under specific circumstances. Publicity of a case should happen only when the victim or survivor initiates it, there is informed consent and all the risks of going public have been communicated to the victim. The survivor/victim reserves the right to withdraw consent at any time. The Organization shall not provide access to victims out of its own volition.

4.12.2 Those survivors/victims requesting media coverage and exposure shall be made aware of the possible problems that can arise from approaching the media. In case the victim/survivor has to appear for press conferences or media interviews, the victim/survivor must be prepared for the possible type of questions s/he will have to face. The victim/survivor will be made aware that they reserve the right to decline to answer questions and to exit the interview/press event at any time if they feel uncomfortable. The Organization shall take measures to vet media personnel allowed to approach the victim/survivor and will debrief them regarding the ethics of dealing with such sensitive topics.

4.12.3 The victim or survivor will never be used for advancing the interests of the Organization. The interest and well-being of the survivor must be the top priority at all times. The Organization shall designate a person who shall be responsible for keeping the victim/survivor updated, act as a focal point of contact with the media and, if need be, issuing a statement with the full knowledge and consent of the victim/survivor.

4.12.4 The Organization or the assigned focal person shall at no point pressurise the victim/survivor. The Organization shall restrict its role to supporting, facilitating and protecting the victim/survivor in their wish to approach the media.