

Your response

| Questions for industry | Your response |
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| <p>Question 1: Are you providing a UK-established service that is likely to meet the AVMSD definition of a VSP?</p> <p>Please provide details of the service where relevant. The establishment criteria under the AVMSD are set out in annex 5.</p> | <p>Confidential? – Y/ No</p> <p>OnlyFans is a social media platform whereby Content Creators can monetise their following by offering exclusive content to their Fans, advertisement free, for a monthly US\$ subscription price. Additional features include pay-per-view messaging, paid posts, exclusive content, subscription management tools and fan interaction.</p> <p>OnlyFans meets the definition of a VSP in the AVMSD/under the Communications Act as the platform allows for the provision of videos to members of the public as “the principal purpose of the service or of the dissociable section of the service”.</p> <p>OnlyFans is headquartered and operated in the UK by Fenix International Limited.</p> |
| <p>Question 2: Is your service able to identify users based in specific countries and do you provide customised User Interfaces (UI), User Experience (UX) functionality or interaction based on perceived age and location of users?</p> | <p>Confidential? – Y/ No</p> <p>When a user registers, we store their geo-location.</p> <p>We do not offer a customised user interface other than offering a Dark Mode for users.</p> <p>OnlyFans is an Over 18 website. Other than this gateway, we do not modify functionality or interaction based on age/location.</p> <p>We do have some countries that the website cannot be used. These are high risk regions</p> |

Question 3: How does your service develop and enforce policies for what is and is not acceptable on your service? (including through Ts&Cs, community standards, and acceptable use policies)

In particular, please provide information explaining:

- **what these policies are and whether they cover the categories of harm listed in the AVMSD (protection of minors, incitement to hatred and violence, and content constituting a criminal offence – specifically Child Sexual Exploitation and Abuse, terrorist material, racism and xenophobia);**
- **how your service assesses the risk of harm to its users;**
- **how users of the service are made aware of Ts&Cs and acceptable use policies; and**
- **how you test user awareness and engagement with Ts&Cs.**

Confidential? – ~~Yes~~ No

Ensuring our platform provides a safe environment for our users remains a top priority for OnlyFans.

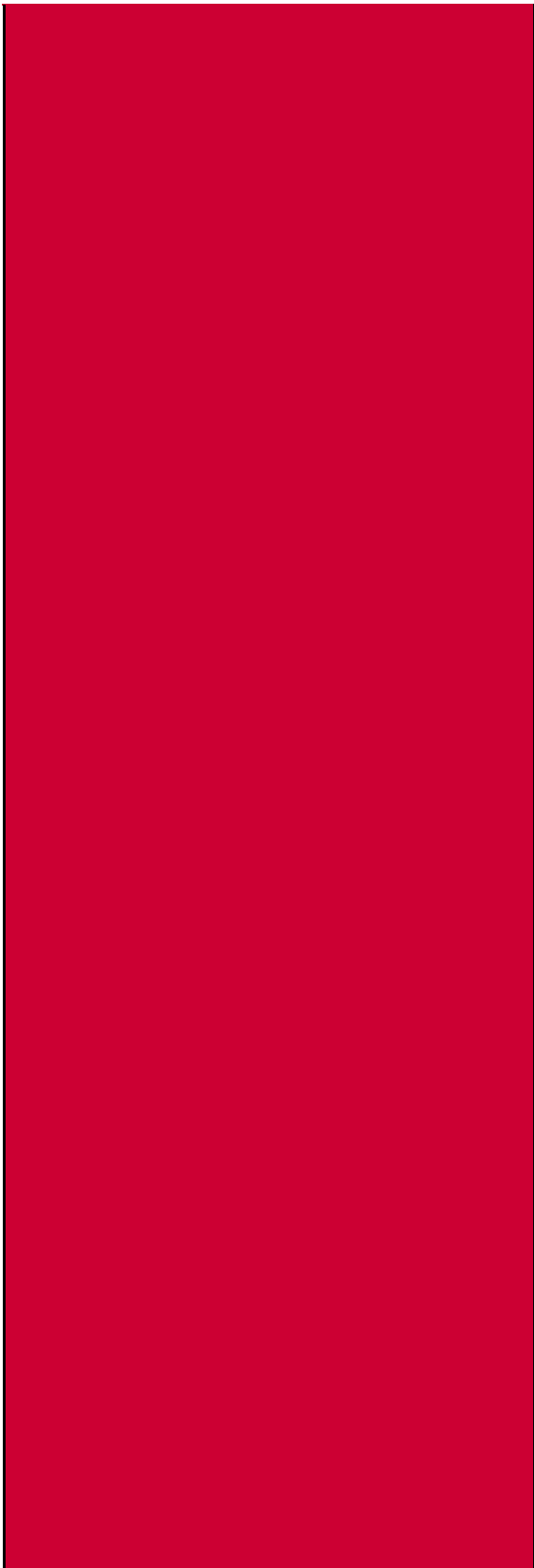
Our Terms of Service ([link](#)) clearly set out acceptable use of the platform (see section 10), including users may not:

- use OnlyFans for the purpose of exploiting, harming, or attempting to exploit or harm minors in any way by exposing them to inappropriate content, asking for personally identifiable information, or otherwise; and
- advertise 3rd party commercial activities or sales.

Our Terms of Service prohibit users from uploading or sharing content that:

- is obscene, illegal, fraudulent, defamatory, libelous, hateful, discriminatory, threatening or harassing, or in any way which incites violence or violates any of the aforementioned prohibitions;
- promotes or advertises firearms or other weapons, or drugs etc.;
- promotes any illegal activity or advocates/promotes an unlawful act; and
- depicts anyone under 18.

Our Terms of Service are available on our website for anyone to review. All fans and creators must agree to be bound by the Terms of Service at the time of their initial or any subsequent subscription to the platform.



We have a team who are responsible for enforcing these terms and monitoring content. When a new account is opened by a Creator, we monitor the first 7-10 active days of use to ensure that the provided content is consistent with our Terms of Service.

We use a mixture of manual oversight and proprietary AI image recognition software to monitor and manage media content on OnlyFans. The AI recognition systems automatically filter all media for the following criteria:

- Images of underage persons
- Obscene Imagery
- Actions which may violate our Terms of Service

Any image that triggers these filters is manually reviewed and action is taken where necessary.

Question 4: How are your Ts&Cs (or community standards/ acceptable use policies) implemented?

In particular, please provide information explaining:

- **what systems are in place to identify harmful content or content that may breach your standards and whether these operate on a proactive (e.g. active monitoring of content) or reactive (e.g. in response to reports or flags) basis;**
- **the role of human and automated processes and content moderation systems; and**
- **how you assess the effectiveness and impact of these mechanisms/ processes.**

Confidential? – ~~Yes~~ No

Creators and Fans are required to follow our Terms of Service that set out the types of content and behaviour that are prohibited on the platform.

As mentioned above we use a mixture of human and AI monitoring. When content is flagged as breaching our acceptable use guidelines our Trust and Safety Team take an assessment of the breach and determine the action to take in each case. Breaches are reviewed on a case by case basis and the training for these breaches is ongoing. OnlyFans evaluates upwards of 300k media files uploaded daily. These files all pass through proprietary software and third-party vendor software content filters.

We also manually review snapshots from video content and we utilise semantic patterns from chat texts to monitor for any possible violations. Live video is also monitored by a team. Additionally, we operate a robust and frequently updated ‘prohibited words’ system to prevent users from discussing prohibited actions and subject matter on the platform. This is further supplemented by keyword searches of profiles, bios and public posts by our team to ensure compliance.

OnlyFans also employs community reporting via “Report Post” and “Report User” links on every page. Reports are monitored, reviewed and acted upon accordingly. Any suspected content would be subject to OnlyFans monitoring regulations.

If we uncover any serious criminal activity then we will report the appropriate police or law agency. We work closely with a number of law enforcement agencies to ensure safety of our users in the online space

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| <p>Question 5: Does your service have advertising rules?</p> <p>In particular, please provide information about any advertising rules your platform has, whether they cover the areas in the AVMS Directive, and how these are enforced. See Annex 5 for a copy of the AVMSD provisions.</p> | <p>Confidential? – Y/No</p> <p>OnlyFans, as the VSP, do not market, sell, arrange or allow advertising on the platform. Creators are also prohibited from using the platform to advertise.</p> <p>Our Terms of Service state that users may not transmit, or procure the sending of, any advertising or promotional material, including any “junk mail”, “chain letter”, “spam”, or any other similar solicitation. They further prohibit advertisement of 3rd party commercial activities or sales.</p> |
| <p>Question 6: How far is advertising that appears on your service under your direct control, i.e. marketed, sold or arranged by the platform?</p> <p>Please provide details of how advertising is marketed, sold and arranged to illustrate your answer.</p> | <p>Confidential? – Y/ No</p> <p>N/A see above.</p> |
| <p>Question 7: What mechanisms do you have in place to establish whether videos uploaded by users contain advertising, and how are these mechanisms designed, enforced, and assessed for effectiveness?</p> | <p>Confidential? – Yes</p> |

Question 8: Does your service have any reporting or flagging mechanisms in place (human or automated)?

In particular, please provide information explaining:

- **what the mechanisms entail and how they are designed;**
- **how users are made aware of reporting and flagging mechanisms;**
- **how you test user awareness and engagement with these mechanisms;**
- **how these mechanisms lead to further action, and what are the set of actions taken based on the reported harm;**
- **how services check that any action taken is proportionate and takes into account Article 10 of the European Convention of Human Rights (freedom of expression);**
- **how users (and content creators) are informed as to whether any action has been taken as a result of material they or others have reported or flagged;**
- **whether there is any mechanism for users (including uploaders) to dispute the outcome of any decision regarding content that has been reported or flagged;**
and
- **any relevant statistics in relation to internal or external KPIs or targets for response.**

Confidential? – Yes

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| <p>Question 9: Does your service allow users to rate different types of content on your platform?</p> <p>Please provide details of any rating system and what happens as a result of viewer ratings.</p> | <p>Confidential? – Yes No</p> <p>OnlyFans does not have a rating system. However users can indicate they have enjoyed a piece of content; they can like it, comment on it, share it and save it to their favourites.</p> |
| <p>Question 10: Does your service use any age assurance or age verification tools or related technologies to verify the age of users?</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> · how your age assurance policies have been developed and what age group(s) they are intended to protect; · how these are implemented and enforced; · how these are assessed for effectiveness or impact; and <p>if the service is tailored to meet age-appropriate needs (for example, by restricting specific content to specific users), how this works.</p> | <p>Confidential? – Yes</p> |

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| <p>Question 11: Does your service have any parental control mechanisms in place?</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> · how these tools have been developed; · what restrictions they allow; · how widely they are used; and · how users of the service, and parents/ guardians if not users themselves, are made aware of and encouraged to use the parental control mechanisms that are available. | <p>Confidential? – Yes</p> |
| <p>Question 12: Does your service have a complaints mechanism in place? Please describe this, including how users of your service can access it and what types of complaint they can make.</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> · any time limits for dealing with complaints; · how complainants are informed about the outcomes of complaints; · any appeals processes, how they work, and whether they are independent from the complaints processes; and · the proportion of complaints which get disputed or appealed. | <p>Confidential? – Yes No</p> <p>If a user has a general concern or complaint they can contact our support team at support@onlyfans.com.</p> <p>We also monitor and engage with our users on Social Media via Twitter and Instagram DM's.</p> <p>For issues with copyright and stolen content, they can reach out to our DMCA team at dmca@onlyfans.com.</p> <p>For compliance related concerns, users can contact compliance@onlyfans.com.</p> |

Question 13: What media literacy tools and measures are available on your service?

In particular, please provide any relevant information about:

- **how you raise awareness of media literacy tools and measures on your service;**
- **how you assess the effectiveness of any media literacy tools and measures provided on your service; and**
- **how media literacy considerations, such as your users' ability to understand and respond to the content available to them feature in your thinking about how you design and deliver your services, for example in the user interfaces, flagging content and use of nudges.**

Confidential? – ~~Yes~~ No

OnlyFans currently have FAQs and blogs that are continually refreshed with new material being posted.

Question 14: Do you publish transparency reports with information about user safety metrics?

Please provide any specific evidence and examples of reports, information around the categorisation and measurements used for internal and external reporting purposes, and whether you have measures in place to report at country/ regional level and track performance over time.

Confidential? – Yes

Question 15: What processes and procedures do you have in place to measure the impact and effectiveness of safety tools or protection measures?

If not already captured elsewhere in your response, please provide information relevant to all of the measures listed above explaining:

- **how you test and review user awareness and engagement with each measure (including any analysis or research that you would be willing to share with Ofcom);**
- **how often policies and protection measures are reviewed, and what triggers a review; and**
- **how you test the impact of policies on users and the business more generally, such as how you balance the costs and benefits of new tools.**

Confidential? – Yes

Question 16: How do you assess and mitigate the risk of inadvertent removal of legal or non-harmful content?

In particular, please provide any information on:

- **how freedom of expression is taken into account during this assessment;**
- **how appeals are handled and what proportion are successful; and**
- **audits of automated removal systems and, if you have them, any metrics that relate to their effectiveness.**

Confidential? – Yes

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| <p>Question 17: Have you previously implemented any measures which have fallen short of expectations and what was your response to this?</p> <p>Please provide evidence to support your answer wherever possible.</p> | <p>Confidential? – Yes</p> |
| <p>Question 18: How does your service develop expertise and train staff around different types of harm? (e.g. do you have any partnerships in place?)</p> | <p>Confidential? – Yes</p> |

| <p>Questions for all stakeholders</p> | <p>Your response</p> |
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| <p>Question 19: What examples are there of effective use and implementation of any of the measures listed in article 28(b)(3) the AVMSD 2018?</p> <p>The measures are terms and conditions, flagging and reporting mechanisms, age verification systems, rating systems, parental control systems, easy-to-access complaints functions, and the provision of media literacy measures and tools. Please provide evidence and specific examples to support your answer.</p> | <p>Confidential? – Y/ No</p> <p>See answers to Q3, Q4 and Q8.</p> |
| <p>Question 20: What examples are there of measures which have fallen short of expectations regarding users' protection and why?</p> <p>Please provide evidence to support your answer wherever possible.</p> | <p>Confidential? – Yes</p> |
| <p>Question 21: What indicators of potential harm should Ofcom be aware of as part of its ongoing monitoring and compliance activities on VSP services?</p> <p>Please provide evidence to support your answer wherever possible.</p> | <p>Confidential? – Yes</p> |

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| <p>Question 22: The AVMSD 2018 requires VSPs to take appropriate measures to protect minors from content which ‘may impair their physical, mental or moral development’. Which types of content do you consider relevant under this? Which measures do you consider most appropriate to protect minors?</p> <p>Please provide evidence to support your answer wherever possible, including any age-related considerations.</p> | <p>Confidential? – Yes</p> |
| <p>Question 23: What challenges might VSP providers face in the practical and proportionate adoption of measures that Ofcom should be aware of?</p> <p>We would be particularly interested in your reasoning of the factors relevant to the assessment of practicality and proportionality.</p> | <p>Confidential? – Yes</p> |
| <p>Question 24: How should VSPs balance their users’ rights to freedom of expression, and what metrics should they use to monitor this? What role do you see for a regulator?</p> | <p>Confidential? – Yes</p> |

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| <p>Question 25: How should VSPs provide for an out of court redress mechanism for the impartial settlement of disputes between users and VSP providers? (see paragraph 2.32 and article 28(b)(7) in annex 5).</p> <p>Please provide evidence or analysis to support your answer wherever possible, including consideration on how this requirement could be met in an effective and proportionate way.</p> | <p>Confidential? – Yes</p> |
| <p>Question 26: How might Ofcom best support VSPs to continue to innovate to keep users safe?</p> | <p>Confidential? – Yes</p> |
| <p>Question 27: How can Ofcom best support businesses to comply with the new requirements?</p> | <p>Confidential? – Y No</p> <p>We welcome the collaborative approach taken so far by Ofcom in having open conversations with VSPs about the service they offer and working together to find realistic commercial solutions that support providing a safe environment online.</p> <p>Further guidance on how Ofcom envision certain requirements to be implemented would be welcome, such as the out of court dispute resolution and medial literacy requirements.</p> <p>Ofcom could also support or enable discussions between VSP providers to establish best practices.</p> |
| <p>Question 28: Do you have any views on the set of principles set out in paragraph 2.49 (protection and assurance, freedom of expression, adaptability over time, transparency, robust enforcement, independence and proportionality), and balancing the tensions that may sometimes occur between them?</p> | <p>Confidential? – Yes</p> |