# **Insufficient Verification and Moderation**

# Cover Page: National Center on Sexual Exploitation's Policy on Sharing Proof

**WARNING**: The material in this document may contain graphic text, blurred images, and survivor quotes that may trigger the viewer.

## Why do we post proof in the first place?

NCOSE researchers have collected this proof as evidence of the material that is made, contained, and/or distributed by the corporations and institutions NCOSE is confronting.

Proof is shared with corporate executives, shareholders, and/or board members, as well as with policymakers, law enforcement, journalists, and the general public to give witness to the sexual exploitation and abuse that is often rampant, yet sometimes hidden, on these platforms.

#### Why do you blur out images, including faces, if they're publicly available?

While we believe it is important to provide ample evidence of wrong-doing to support our claims and inspire change, we also strongly believe that no one – neither adult, nor child – should be exposed to the type of material our researchers collect: either for their own well-being, or out of respect for those being exploited. It is for this reason we pixelate/blur/block not only nudity or sexually graphic content, but also the faces of those being exploited.

We also want to limit access to this material (unfortunately, a luxury not afforded to children and adults using many of the platforms and products made by these companies). Therefore, we add several layers before someone can access the proof, and also don't include all the proof that we have obtained. If someone feels they need to see more evidence to understand the extent of the problem or the type of exploitation that is happening, they may request it of NCOSE by writing to <a href="mailto:public@ncose.com">public@ncose.com</a>.

#### Did you receive people's permission to post?

Any personal testimony shared to NCOSE directly is posted only with the affected parties approval.

For material that is publicly available, we do not seek permission to post. However, we redact names and usernames of survivors from articles, social media, etc. even when publicly available. To read more about our commitment to ethical engagement with survivors, please go <a href="here">here</a>. We do not redact names or usernames of exploiters who have posted publicly.

Disclaimer: while we do collect information on those who request access to more proof, that information will only be used for our own, internal analysis. It will not be distributed, shared, or posted publicly or with outside parties.

OnlyFans verification and moderation systems have proven to be insufficient in keeping criminal and harmful activity off of the platform. Many have found ways to circumvent the systems. The below news article report on OnlyFans' faulty verification and moderation systems.

- "Under the Skin of OnlyFans", July 2021, BBC
  - One creator was hacked, and moderation and verification did not catch the hacks or help her in any way.
    - "Tina says after a tortuous cycle of repeatedly being hacked over a month, she reported this to OnlyFans and temporarily disabled her account. She has now lost nearly all of her subscribers and earns just \$100 a week - if she's lucky.
      - In a statement, OnlyFans said the account did not have two-factor authentication, which made it vulnerable. The company said Tina did not report the racial slur and it was not detected by the site's moderation system because it was pluralised."
  - "The BBC has interviewed dozens of creators in the UK and US, seen copies of complaints and correspondence with OnlyFans, and found:
    - Terror videos, rape threats and racial abuse have been posted on the site in the past year in violation of its terms of service, as well as explicit photos of a student uploaded without her consent
    - Data protection experts have raised concerns about the security of the website's server after creators were hacked, or affected by glitches resulting in nude photos of others appearing on their accounts
    - OnlyFans' policy of granting automatic refunds to fans who are blocked can perpetuate and incentivise abuse, according to creators

The site has now adjusted its processes around closing creators' accounts after the BBC questioned why one had her page shut down without explanation, which resulted in it being restored

OnlyFans explicitly states on its website that it is "not responsible" for moderating content, or detecting breaches of the law or its policies, which includes bans on harassment and sharing illegal or non-consensual images.

But it told the BBC that, while it was not legally obliged to proactively review content on the platform, it goes "above and beyond" what current regulations require by using community reporting and artificial intelligence software to help keep users safe."

- "The children selling explicit videos on OnlyFans", May 2021, BBC
  - This BBC Investigation found clear ways to bypass OnlyFans' verification systems and policies
  - "But BBC News tested the site's "new exceptionally effective" system in April. While a fake ID did not work, we were able to set up an OnlyFans account for a 17-year-old by using her 26-year-old sister's passport. The girl never had access to the account."
  - "After setting up an account, creators must provide bank details to receive payment through OnlyFans. However, this does not prevent them posting images and videos.

BBC News has found that creators can share content and then arrange payments through alternative providers, in violation of company guidelines. One of the most popular is Cash App, which allows users to transfer money by mobile phone. We found scores of accounts advertising this.

We were then able to send a direct message to a subscriber and request payment through Cash App, using a common alternative spelling (Ca\$happ).

- "OnlyFans: How it handles illegal sex videos BBC investigation", August 2021, BBC
  - "Internal documents, leaked to BBC News, reveal that OnlyFans allows moderators to give multiple warnings to accounts that post illegal content on its online platform before deciding to close them. Described as a "compliance manual", the documents also show that staff are asked to be more lenient towards successful accounts on the British content-sharing service."
  - The BBC interviewed OnlyFans content moderators, who revealed the sites bad practices. One content moderator who went by the pseudonym Christof "says he has found illegal and extreme content in videos including bestiality involving dogs and the use of spy cams, guns, knives and drugs. Some material is not actively searched for by moderators as frequently as he believes it should be, says Christof, despite being banned under the platform's terms of service."
  - "On multiple occasions, [Christof] says, OnlyFans told him he over-moderated, particularly in relation to videos showing sex in public and to "third-party" content material featuring people not registered with OnlyFans."
  - Christof speaks to how moderators were instructed to be more lenient to lucrative accounts, giving them additional warning: "'There is a discrimination between accounts,' says Christof. 'It shows money is the priority.'"
- A college OnlyFans creator says sex work isn't the best creative outlet", February 2022, Her Campus
  - o Former OnlyFans creator testifies that the platform does not make it easy enough for content creators to block concerning subscribers: "I thought OnlyFans would want to make sure I as a creator felt safe and comfortable, because there were really weird, creepy guys on there," she says. "But, at the time, I had to go through hours of Google searches to figure out how to block guys just to get them out of my face."

- "Gemma Atkinson issues warning after fake account attempts to charge her followers", March 2021, Express
  - "Gemma Atkinson has issued a warning today, after a fake account claiming to be her
    on Instagram attempted to get people to subscribe to a supposed OnlyFans profile of
    her that does not exist."

### Onlyfans' verification process:

Onlyfans' verification process for creator accounts requires submitting a picture of government-issued photo ID, a selfie with the ID held up to their face, and providing a link to a social media account. Every individual featured in content must either have a verified account or have an account owner provide pictures of their photo ID. The below screenshots detail OnlyFans' verification process. As evinced above, however, these verification procedures have proven to be insufficient. See also our proof of child sexual abuse material on OnlyFans.

#### Creators Featured in Content

If your content contains someone other than you, you must either:

- · Tag that person's OnlyFans account; or
- . If they do not have an OnlyFans account, please ask them to make one;
- If they cannot make an OnlyFans account, you will need to provide a copy of their photo ID and release documents before the content can be posted.

To tag a Creator's account, simply @ their username. You can also include their full URL "onlyfans.com/<insertusernamehere>" to generate a card that links to their profile at the bottom of your post.

Creator accounts must feature the person whose ID is on file with OnlyFans and who has passed all of the ID verification requirements.

Please review our Terms of Service for more information.

If an account features other creators, please note that the majority of the content must feature the person whose ID is on file with OnlyFans and who has passed all of the ID verification requirements.

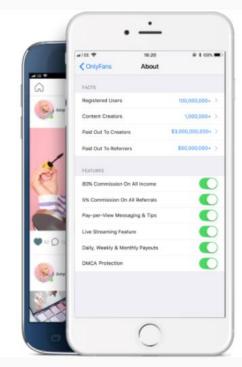
### Rejected applications

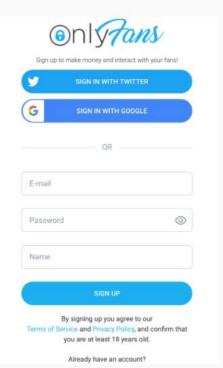
Applications may be rejected for the following reason(s):

- · Poor quality selfie with a government-issued, non-expired photo ID
- · Poor quality image of a government-issued, non-expired photo ID or passport
- · Provided ID is expired or will expire in less than 30 days
- · Provided ID is invalid or damaged (hole-punched, cracked/taped, cut-up)
- · Provided ID is not government-issued and/or does not contain holder's photo
- · A secondary form of ID is required at this time (preferred: international passport with English characters)
- · Images of the front and back of your government-issued ID are required
- · A photo of your government-issued ID and a selfie photo with your government-issued ID are required
- Verification by additional social media is required at this time; you may complete this step by linking your
  Twitter account or by allowing access for verification to another social media platform such as Instagram or
  Facebook
- Cover image and/or profile photo does not match your identity; please note that for any third-party content, you must submit:
  - the Creator's ID
  - · the Creator's selfie photo with matching ID
  - · a Creator release form
  - · the Creator's selfie photo with signed release form
- Cover images or profile photos are misleading or confusing. Images should represent the type of content you
  intend to post
- · Cover image and profile photo do not match criteria, they cannot contain nudity and/or sexual material
- · Submitted account application for 2 or more Creators; additional documents are required:
  - · all Creator's government issued, non-expired IDs
  - · all Creator's selfie photos with government-issued, non-expired IDs
- Submitted account promotes escort services, which are prohibited by our Terms and Conditions
- Submitted account suggests direct contact with Fans, which is prohibited by our Terms and Conditions
- Submitted Account suggests third-party payment processors or services in the About Section, website URL, cover image or profile photo
- · Submitted account owner is not over the age of 18

#### HOW TO START AN ONLYFANS ACCOUNT

Setting up as a content creator on OnlyFans is pretty easy to do. To get started, go to the OnlyFans website and sign up. It's free and easy to do.





Afterwards, you will need to submit an ID to verify your identity. Once this process has been completed, your account will be approved. This doesn't take too much time, so you won't be waiting for long, and you'll be able to start using OnlyFans as soon as possible. For security purposes, we recommend attaching your personal social media accounts with your content clearly featuring yourself so that we can swiftly authenticate your account. The more personal channels you have attached, the easier it will be for us to validate your account.

#### Lacey (OnlyFans)

Jan 12, 2022, 7:42 G

Hello Lorenza,

Thank you for using OnlyFans.

If you are interested to earn on our platform by posting your content, as the first step, you need to pass the identity verification through a certified document service Ondato.com

You may hit the "COMPLETE VERIFICATION" button on the following page to start the verification procedure: https://onlyfans.com/my/banking.

When you pass the Ondato procedure, you will be able to fill in all the requested information on the Banking page for our Compliance team to review your profile.

We require two images to verify your identity.

1) Please upload an image of a valid and in-date photo ID document (a passport or driving license, with all the information clearly visible). The image may not be edited, cropped, or resized, but must display the document in full size, in the correct orientation, and with the minimum background. The file must be .png, or .jpg under 7MB in size. Avoid capturing glances, reflections, or other optical effects.

2) Upload an image holding your photo ID (i.e. a selfie, ensuring your face and ID are clearly visible).

Here is a good example: https://blog.onlyfans.com/wp-content/uploads/Example-ID-Images.png

Upload both pictures with your ID at your Banking page, for our team to review your application: https://onlyfans.com/my/banking.

3) You can add a link to your profile on any other social media platform there, such as instagram. (In case it is set to the private mode at the moment of the verification, please set it to the public, so we may check your identity). And connecting your Twitter account to OnlyFans should also influence the process.

4) Also, we recommend uploading the cover picture and avatar that will represent the type of content you are going to post. However, please keep in mind that while explicit material is allowed for profile posts, the cover picture and avatar are visible for every visitor, so the information is more sensitive and requires censorship.

5) Please be sure to fill out the "About" section of your profile to speed up the approval process

We hope this information would be helpful. If you have any questions or need further assistance, please do not hesitate to get in touch.

Lacey OnlyFai