



MOVING THE GOALPOSTS: Facial Recognition Technology in football and beyond

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INTRODUCTION

Facial recognition technology (FRT) and broader biometric surveillance tools are rapidly transforming the global sport landscape.

From North American baseball stadiums adopting 'fast-lane' biometric entry systems, to European football clubs trialling live facial recognition for crowd control and enforcement of banning orders, to mandatory biometric turnstiles in Brazilian stadiums, the sports sector is becoming an important testing ground for surveillance technologies.

This report examines these developments and evaluates their implications for privacy, discrimination and the long-term impact on football culture in the UK.

Around the world, the same patterns are emerging: clubs and governments alike frame deployments of FRT as convenient or safety-enhancing, yet in practice, they suffer from low transparency, limited meaningful consent and weak regulatory oversight. At the same time, facial recognition used for security, policing and enforcement introduces significant risks of false positives, wrongful exclusion, discriminatory impacts, and mission creep.

Beyond these harms, a deeper societal harm is at play through deploying FRT in a sporting context: normalisation and acceptance of biometric surveillance.

This report argues that any consideration of FRT in football the football context should not be allowed as it does not meet criteria of necessity and proportionality, and that rights-preserving alternatives to the technology exist.

Biometric surveillance in sports carries substantial risks, and once normalised, these systems are extremely difficult to roll back, in football and beyond the pitch.

The stakes are high.

KEY FINDINGS

- Use of facial recognition technology (FRT) is expanding across global sport, from Major League Baseball's (MLB) biometric fast-lanes to European football trials and mandatory stadium biometrics in Brazil. These developments are positioning sports venues as testing grounds for broader public surveillance.
- FRT disproportionately expands policing and public order controls, especially around football and other cultural events. Deployments by the Met Police and South Wales Police illustrate a shift to surveillance on a mass scale.
- False positives and discrimination remain major risks, with documented harms including 2000+ wrongful matches at Cardiff's Champions League final and misidentifications in the Netherlands leading to wrongful bans.
- Mission creep is a consistent pattern. Tech introduced for ticketing or 'fan experience' are easily repurposed for policing, profiling, expanded state surveillance or other grievances (such as the case of MSG lawyers).
- Regulatory bodies are increasingly hostile to stadium FRT deployments. Spain's AEPD and France's CNIL have repeatedly found biometric ticketing unnecessary and unlawful. The EU AI Act introduces bans on certain live FRT - but enforcement remains uncertain.
- Deployments of FRT in sport are contributing to the normalisation of surveillance.
- Fan groups oppose stadium FRT. The UK FSA has passed motions against turnstile FRT pending transparency and legal clarity, and international campaigns highlight growing cultural resistance.
- Premier League clubs are cautious, likely avoiding FRT due to legal ambiguity, reputational risks and infrastructure costs.
- Sports surveillance amplifies broader societal risks, including chilled protest rights, exclusion, data sharing and the embedding of biometric monitoring into everyday life. It's not just football, it's everything.

TRENDS

This section provides an analysis of the global expansion of FRT across sports venues - spaces that become testing grounds for surveillance.

North America: Commercialisation and Normalisation

In the United States, FRT has been introduced primarily for commercial stadium operations rather than security mandates. Major League Baseball's 'Go-Ahead Entry' system¹ allows fans to upload selfies via a team's app and enter stadiums through dedicated lanes. Vendors promote the system as fully opt-in, claiming facial images are converted into numerical templates and deleted after processing, and that no third-party sharing occurs.

However, digital rights organisations such as Fight for the Future, Amnesty International and the Surveillance Technology Oversight Project have warned that this technology introduced for convenience can be repurposed. In October 2024, a class action lawsuit alleged that the New York Mets used similar FRT systems to profit from biometric identifiers without proper consent, allegedly violating New York City biometric privacy law².

A parallel example of mission creep occurred at Madison Square Garden (MSG), where FRT was reportedly used to identify and exclude lawyers whose firms were litigating against the venue's ownership. Individuals holding valid tickets were denied entry without prior notice, prompting investigation by the New York

¹ Caroline Haskins, *Stadiums Are Embracing Face Recognition. Privacy Advocates Say They Should Stick to Sports*, *Wired* (21 August 2024) <https://www.wired.com/story/face-recognition-stadiums-protest/>, accessed 27 Jan 2026

² Christopher R. Deubert and Sydney A. Hardy, *'Fan Challenges Use of Facial Recognition at New York Mets' Citi Field'*, *Constangy Cyber Advisor* (15 December 2025) https://www.constangy.com/constangy-cyber-advisor/fan-challenges-use-of-facial-recognition-at-new-york-mets-citi-field?utm_source=chatgpt.com

Attorney General and widespread public condemnation.³ This illustrates how private venues can abuse FRT systems beyond their original purpose, raising due process and discrimination concerns.

Europe: Regulatory Resistance and Experimental Trials

European football has experienced numerous pilot deployments of FRT - followed by regulatory intervention.

Clubs including Valencia CF, Atlético Osasuna and FC Metz trialed biometric ticketing and identification systems for access control and enforcement of banning orders⁴. These trials frequently occurred with limited public disclosure, undermining transparency and informed consent as required by the EU General Data Protection Regulation (GDPR)⁵.

Spain's Data Protection Authority (AEPD) sanctioned Osasuna for use of FRT in late 2024, imposing a €200,000 fine and ordering the deletion of biometric data. The regulator concluded that consent was invalid under GDPR because less intrusive alternatives such as QR codes were readily available, and that necessity and proportionality thresholds were not met⁶. Despite fines against La Liga clubs in

³ Kashmir Hill and Corey Kilgannon, *Lawyers Barred by Madison Square Garden Found a Way Back In*, The New York Times (16 January 2023) <https://www.nytimes.com/2023/01/16/technology/madison-square-garden-ban-lawyers.html>

⁴ Football Supporters Europe and Reclaim Your Face, *Football Fans Are Being Targeted by Biometric Mass Surveillance*, Football Supporters Europe (28 September 2022) <https://www.fanseurope.org/news/football-fans-are-being-targeted-by-biometric-mass-surveillance/>

⁵ Manon Punie, *GDPR and Biometric Data: The Lessons from Atlético Osasuna's Fine*, Datenschutz-Notizen (20 February 2025) <https://www.datenschutz-notizen.de/gdpr-and-biometric-data-the-lessons-from-atletico-osasunas-fine-3852426>

⁶ Manon Punie, *GDPR and Biometric Data: The Lessons from Atlético Osasuna's Fine*, Datenschutz-Notizen (20 February 2025) <https://www.datenschutz-notizen.de/gdpr-and-biometric-data-the-lessons-from-atletico-osasunas-fine-3852426>

Spain, regulatory enforcement hasn't resulted in sector-wide policy change, yet. Rather, clubs are pushing back on these fines⁷.

In France, the data protection authority CNIL prohibited facial recognition trials at FC Metz's Stade Saint-Symphorien, finding the processing unlawful under GDPR⁸. However, national legislation adopted ahead of the Paris 2024 Olympics authorised the use of AI-enabled FRT in public spaces, and was later extended under the justification of preparing for the 2030 Winter Olympics. Civil society organisations such as La Quadrature du Net and PI have consistently warned of post-event surveillance 'drift'⁹ where temporary security measures become permanent infrastructure, and in the case of the Paris Olympics were proven correct.

The EU Artificial Intelligence Act further constrains biometric identification by classifying real-time FRT in public spaces as a high risk or prohibited use case¹⁰, although key implementation details remain unresolved and enforcement capacity has been identified as limited¹¹. These European deployments therefore illustrate regulatory tension between tech ambitions and rights-based governance.

⁷ Ayang Macdonald, *LaLiga disputes 1m fine from AEPD over stadium Biometrics*, Biometric Update, (6 March 2025), <https://www.biometricupdate.com/202503/laliga-disputes-e1m-fine-from-aepd-over-stadium-biometrics>

⁸ Masha Borak, *EU Ban on 'Unacceptable' AI Comes into Force with Crucial Details Unresolved*, Biometric Update (3 February 2025) <https://www.biometricupdate.com/202502/eu-ban-on-unacceptable-ai-comes-into-force-with-crucial-details-unresolved>

⁹ *Let's Beware of a Post-Olympic Drift in the Use of AI-Powered Video Surveillance*, Le Monde (26 September 2024) https://www.lemonde.fr/en/opinion/article/2024/09/26/let-s-beware-of-a-post-olympic-drift-in-the-use-of-ai-powered-video-surveillance_6727335_23.html

¹⁰ Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act), *Official Journal of the European Union* (12 July 2024) <https://eur-lex.europa.eu/eli/reg/2024/1689/oj>

¹¹ Masha Borak, *EU Ban on 'Unacceptable' AI Comes into Force with Crucial Details Unresolved*, Biometric Update (3 February 2025) <https://www.biometricupdate.com/202502/eu-ban-on-unacceptable-ai-comes-into-force-with-crucial-details-unresolved>

United Kingdom: Policing Driven Expansion and Fan Resistance

In the UK, FRT expansion in sports has been driven primarily by police rather than clubs themselves, creating an environment different than those in North America and Europe.

South Wales Police used live FRT during high profile football derbies between Cardiff City and Swansea City to identify individuals subject to football banning orders¹². In 2017, it was revealed over 2000 false matches were generated at the Champions League final between Juventus and Real Madrid in Cardiff¹³, undermining confidence in FRT system accuracy.

The UK Court of Appeal ruled in *R (Bridges) v South Wales Police*¹⁴ that police use of live FRT lacked sufficient safeguards, including inadequate watchlist governance and equality impact assessments. Despite this ruling, police deployments continue under revised internal policies rather than statutory frameworks¹⁵.

The Metropolitan Police (The Met Police) in London deployed live FRT outside the Arsenal vs Tottenham Premier League match in 2023 – a significant derby match in North London. This surveillance was beyond stadium boundaries into surrounding transport and public areas. Civil liberties groups criticised the proportionality

¹² *South Wales football derby: Facial ID technology sparks police row*, BBC (9 January 2020), <https://www.bbc.co.uk/news/uk-wales-51049526>

¹³ Vas Panagiotopoulos, *Soccer Fans, You're Being Watched*, Wired (3 November 2022) <https://www.wired.com/story/soccer-world-cup-biometric-surveillance/>

¹⁴ *R (Bridges) v Chief Constable of South Wales Police* [2020] EWCA Civ 1058 (Court of Appeal) <https://www.judiciary.uk/judgments/r-bridges-v-cc-south-wales/> accessed

¹⁵ At the time of writing, the UK Home Office has invited stakeholders to take part in a consultation on a new legal framework for the use of FRT by law enforcement.

rationale, questioning whether tens of thousands of fans could reasonably be considered potential offenders subject to such surveillance measures¹⁶.

It is also important to note that the Met police are similarly criticised for their use of FRT at other cultural events beyond sports. They deployed FRT - alongside 7000 officers - at Notting Hill Carnival, a major cultural event for Londoners. This generated a huge backlash from a wide range of organisations for its racial bias, and unfairly being deployed on individuals trying to celebrate the African-Caribbean community¹⁷.

It is important to note that Premier League clubs themselves have largely avoided FRT adoption. Manchester City reportedly explored biometric fast entry trials using Blink Identity but later confirmed that no active deployment plans existed¹⁸. Fan opposition has been strong to this measure. The Football Supporters' Association passed a motion opposing the use of facial recognition at stadium turnstiles¹⁹ until transparency, consultation and legal clarity are achieved.

Latin America: Mandated Biometrics and Civil Society Pushback

Brazil represents a stark contrast: biometric surveillance is mandated. As of June 2025, Brazilian law requires facial biometric identification for entry to stadiums with

16 *Live facial recognition used by Met Police at football match*, Evening Standard (27 October 2023) <https://www.standard.co.uk/news/london/facial-recognition-met-police-football-arsenal-tottenham-b1116370.html>

17 *Facial recognition cameras too racially biased to use at Notting Hill Carnival, say campaigners*, The Guardian (16 August 2025) <https://www.theguardian.com/uk-news/2025/aug/16/facial-recognition-cameras-too-racially-biased-to-use-at-notting-hill-carnival-say-campaigners>

18 *Maya Wolfe-Robinson, Manchester City warned against using facial recognition on fans*, The Guardian (18 August 2019), <https://www.theguardian.com/technology/2019/aug/18/manchester-city-face-calls-to-reconsider-facial-recognition-tech>

19 *Facial Recognition Turnstiles: Why Supporters Should Be Concerned*, Football Supporters Association <https://thefsa.org.uk/news/facial-recognition-turnstiles-why-supporters-should-be-concerned/>

capacities exceeding 20,000 seats²⁰. Authorities claim that this improves entry speeds and successful arrests.

Brazil's data protection authority (ANPD) has demanded Data Protection Impact Assessments from more than twenty clubs using biometric systems, signalling regulatory concern over transparency and proportionality²¹. Separately, civil-society organisation Article 19 successfully challenged facial recognition use in São Paulo's metro system, with courts ruling that deployments violated fundamental rights and data protection law²².

In parallel, these two pushbacks demonstrate the challenges of biometric governance such as FRT, especially when it's mandated.

Middle East and North Africa: Surveillance at Scale

The 2022 FIFA World Cup in Qatar deployed thousands of AI-enabled cameras across stadiums and transport systems²³. Similarly, Saudi Arabia expanded live FRT across stadiums, pilgrimage sites and city centres, coinciding with major investments in international sporting events and cultural programming²⁴. During the 2026 African Cup of Nations (AFCON), stadiums in the host nation of Morocco were

²⁰ Luke Owain Boulton, *Facial Biometrics Made Obligatory for Entry to Major Stadiums Across Brazil*, Sumsb (17 June 2025) <https://sumsub.com/blog/facial-biometrics-obligatory-for-stadiums-brazil>

²¹ Masha Borak, *Brazil Regulator Demands Details on Stadium Biometrics*, Biometric Update (20 March 2025) <https://www.biometricupdate.com/202503/brazil-regulator-demands-details-on-stadium-biometrics>

²² *Brazil: Civil Society Blocks Facial Recognition Tech on São Paulo Metro*, Article 19 (9 May 2022) <https://www.article19.org/resources/brazil-civil-society-blocks-facial-recognition-tech-on-sao-paulo-metro>

²³ Osama Bin Javid, *Eye in the Sky: AI at World Cup to Check Crowds, Control Climate*, Al Jazeera (13 November 2022) <https://www.aljazeera.com/news/2022/11/13/eye-in-the-sky-ai-at-world-cup-to-check-crowds-control-climate>

²⁴ Aya Iskandarani, *Saudis Use AI, Drones and Thousands of Cameras to Keep Hajj Pilgrims Safe*, Al-Monitor (4 June 2025) <https://www.al-monitor.com/originals/2025/06/saudis-use-ai-drones-and-thousands-cameras-keep-hajj-pilgrims-safe>

fitted with FRT cameras, amongst many other surveillance methods for security purposes²⁵.

Human rights organisations caution that such deployments operate within governance environments offering limited judicial oversight or data protection safeguards²⁶. As we note above regarding the French Olympics, surveillance infrastructure introduced for event security frequently becomes permanent, which can reinforce authoritarian monitoring capacity and export surveillance norms internationally.

²⁵ Morocco's DGSN Hosts FBI Delegation to Study AFCON 2025 Security Model, *Morocco World News* (5 January 2026) <https://www.moroccoworldnews.com/2026/01/273947/moroccos-dgsn-hosts-fbi-delegation-to-study-afcon-2025-security-model/>

²⁶ Dima Samaro, *Morocco's surveillance infrastructure expands ahead of the Africa Cup and World Cup*, *Skyline International* (17 April 2025) <https://skylineforhuman.org/en/news/details/816/moroccos-surveillance-infrastructure-expands-ahead-of-the-africa-cup-and-world-cup>

PATTERNS AND IMPLICATIONS

These examples highlight several emerging patterns in the deployment of FRT in a sporting context.

Stadiums function as pilot environments for FRT before wider deployment

Stadiums are attractive testing grounds for FRT because they combine high traffic, controlled entry points and a strong incentive to optimise queues. This makes them ideal environments for checks as part of everyday leisure to be normalised.

Once biometric systems such as FRT are embedded in sport stadium infrastructure, they generate a powerful combination of normalisation and entrenching of surveillance tools that accelerates their expansion. This dynamic makes rollback difficult.

Biometric systems require substantial upfront investment: cameras, network connectivity, data storage etc. Once these costs are incurred, organisations face strong incentives to maximise the use rather than abandon or decommission the technology.

In stadium contexts, biometric infrastructure rarely remains confined to turnstiles. Cameras installed for access control can support monitoring, crowd analytics and law enforcement integrations.

This is visible in jurisdictions where early pilots have rapidly escalated into permanent systems. Brazil's mandatory biometric turnstiles illustrate how

infrastructure investments become structurally embedded in stadium design, making reversal difficult even when regulatory concerns emerge.²⁷

Conversely, European regulators' intervention in Osasuna²⁸ and FC Metz²⁹ shows how early regulatory pushback can stop this technology becoming entrenched before it becomes irreversible.

Beyond infrastructure, stadium deployments reshape public expectations about what forms of monitoring are acceptable in everyday life. Sporting events are social rituals tied to identity, community and leisure. When biometric scanning becomes part of attending a match, it subtly reframes surveillance as routine, harmless, and even desirable. Sociologists Hutchins and Andrejevic describe this process as the normalisation of biometric monitoring³⁰, whereby spectators become accustomed to automated identification embedded in entertainment environments rather than overt security contexts.

This normalisation effect is particularly powerful because participation in sport is emotionally charged and socially valued. Fans may tolerate intrusions they would resist elsewhere in exchange for convenience, faster entry, or perceived safety³¹.

²⁷ See page 9, *infra*.

²⁸ Joel R. McConvey, *Biometrics in Live Event Venues Face Pushback from Privacy Regulators*, *Biometric Update* (22 January 2025) <https://www.biometricupdate.com/202501/biometrics-in-live-event-venues-face-pushback-from-privacy-regulators>

²⁹ *La CNIL met fin à des tests illicites de reconnaissance faciale au Stade Saint-Symphorien*, CNIL, <https://www.cnil.fr/fr/reconnaissance-faciale-et-interdiction-commerciale-de-stade-la-cnil-adresse-un-avertissement-un-club>

³⁰ Brett Hutchins and Mark Andrejevic, 'Olympian Surveillance: Sports Stadiums and the Normalization of Biometric Monitoring', *International Journal of Communication* 15 (2021) 363–382 <https://ijoc.org/index.php/ijoc/article/view/16377>

³¹ Brett Hutchins and Mark Andrejevic, 'Olympian Surveillance: Sports Stadiums and the Normalization of Biometric Monitoring', *International Journal of Communication* 15 (2021) 363–382 <https://ijoc.org/index.php/ijoc/article/view/16377>

Over time, resistance weakens not because risks disappear, but because exposure becomes familiar. Surveillance becomes infrastructural rather than exceptional.

Turner and Ludvigsen's concept of the 'fan-opticon'³² further explains how supporters internalise monitoring expectations and adapt behaviour accordingly. When attendance is conditioned on identification, surveillance shifts from an external imposition into a background condition of participation. This internalisation reduces friction for future expansions of monitoring beyond the stadium.

Sport therefore occupies an important role in shaping future surveillance norms. Decisions made by leagues and clubs determine whether stadiums act as accelerators of biometric normalisation or as protective buffers that preserve rights.

'Opt-In' is usually a condition for entry, raising questions about consent

Opt-in FRT models often function as conditional to participation rather than truly free consent. Fans experience time and social pressure, limited information and unequal risk exposure.

Meaningful consent requires that individuals understand what data is collected, how it is processed, who can access it, how long it is retained, and what other uses may arise beyond the initial agreement. In live event environments, these conditions are rarely met.

³² Mark Turner and Jan Andre Lee Ludvigsen, 'Theorizing Surveillance and Social Spacing through Football: The Fan-Opticon and Beyond', *Sociology Compass* 17, no. 2 (2023) e13055, doi:10.1111/soc4.13055 <https://doi.org/10.1111/soc4.13055>

Multiple studies indicate that a significant proportion of fans are unaware that FRT is being used in the venues they attend. In Australia, nearly half of surveyed patrons did not know that FRT was operating in stadiums and concert venues, learning about it primarily through media reporting rather than through the venue³³. Signage was often insufficient, unclear, or positioned after ticket purchase, undermining informed choice.

Even when there is basic awareness of the presence of such technology, there can be limited understanding of where information captured may go. Fans enrolling in systems such as MLB's 'Go-Ahead Entry' may understand that their faces enable faster entry, but may not appreciate that their faces could be used for subpoena access, data processing, or future system repurposing³⁴. Privacy disclosures are often insufficient to enable a meaningful understanding of the technologies being used, reflecting a broad concern that this technology is introduced in a way that limits truly informed participation and scrutiny³⁵.

Regulators are increasingly recognising these shortcomings. Spain's AEPD concluded in the Osasuna case that consent cannot legitimise biometric processing where individuals are not truly offered a choice and where less intrusive alternatives exist³⁶. The regulator emphasised that consent is invalid when participation pressure and imbalance of power undermine its voluntary nature.

³³ Melanie Burgess and Annabel Fleming, 'Need to Focus on Consent': Shock Australian Venues Using Face-Scanning Technology, *news.com.au* (6 December 2024)

<https://www.news.com.au/technology/online/security/need-to-focus-on-consent-shock-australian-venues-using-facescanning-technology/news-story/3b58543af6914853912e68e6314375a9>

³⁴ Caroline Haskins, 'Stadiums Are Embracing Face Recognition. Privacy Advocates Say They Should Stick to Sports', *Wired* (21 August 2024) <https://www.wired.com/story/face-recognition-stadiums-protest/>

³⁵ Brett Hutchins and Mark Andrejevic, 'Olympian Surveillance: Sports Stadiums and the Normalization of Biometric Monitoring', *International Journal of Communication* 15 (2021) 363–382
<https://ijoc.org/index.php/ijoc/article/view/16377>

³⁶ Fernando Ciordia, *Sancionan a Osasuna con 200.000 euros por implantar el reconocimiento facial en El Sadar*, *Diario de Navarra* (21 January 2025)
<https://www.diariodenavarra.es/noticias/deportes/futbol/osasuna/2025/01/21/sancionan-osasuna-200-000-euros-implantar-el-reconocimiento-facial-el-sadar-635494-1027.html>

In-built biases can chill fan participation

Furthermore, FRT systems exhibit disparities in accuracy across demographic groups, particularly affecting women, people of colour, younger people, and individuals with disabilities³⁷. When such systems are embedded in stadium access or policing contexts, these in-built biases can translate into unequal treatment.

The Cardiff Champions League deployment provided a cautionary example: over 2000 false matches were generated, many involving individuals with little resemblance to watchlist images. Although not all demographic breakdowns were published, civil liberties groups highlighted the heightened risk of discriminatory targeting in large crowd scanning environments³⁸.

These harms are compounded by limited transparency. Individuals may not know they were flagged by a system, how the match occurred or how to challenge the decision. In the Netherlands, for example, a football supporter was wrongly identified by a facial recognition system deployed by Den Bosch football club and subsequently banned from attending matches, despite having no clear understanding of how the identification was made or access to an effective mechanism to challenge it³⁹. This opacity undermines procedural fairness and accountability.

The combined impact of uninformed enrolment, potential discrimination, and a general lack of transparency can produce a chilling effect on participation, especially for already disadvantaged groups. Fans may avoid matches due to fear of misidentification, profiling, or data misuse. This undermines the role of sport as a

³⁷ *Why Is Facial Recognition Technology Unreliable and Discriminatory?*, inco.net
<https://inco.net/pillars/surveillance-and-digital-rights/principles-for-use-of-frt/why-is-frt-unreliable-and-discriminatory/>

³⁸ Vas Panagiotopoulos, 'Soccer Fans, You're Being Watched', *Wired* (3 November 2022)
<https://www.wired.com/story/soccer-world-cup-biometric-surveillance/> accessed 27 January 2026.

³⁹ European Digital Rights (EDRi), *The Rise and Rise of Biometric Mass Surveillance in the EU: A Legal Analysis of Biometric Mass Surveillance Practices in Germany, the Netherlands and Poland*, pg 84 (2021)

cultural space where diverse communities gather freely and directly undermines the trust between clubs, supporters and governing bodies.

Mission creep enables expansion from convenience to policing

Mission creep describes the gradual expansion of a technology beyond its original purpose into new, often more intrusive uses. In the context of FRT in sport, it isn't a hypothetical. Mission creep is already visible across multiple jurisdictions and institutional settings. Systems initially justified on grounds of convenience, safety, or operational efficiency have been repurposed for exclusion, enforcement, and surveillance, often without renewed public consent, regulatory scrutiny, or democratic oversight.

FRT use at Madison Square Garden in 2018 presents a stark example: individuals were excluded based on opaque corporate agenda unrelated to public safety with no immediate formal appeal mechanisms⁴⁰. When automated systems mediate access to public or quasi-public spaces like stadiums, accountability shifts away from human judgment toward algorithmic discretion.

Hutchins & Andrejevic argue that mission creep is not an unintended side effect of biometric systems but a structural feature of surveillance infrastructures themselves⁴¹. Biometric technologies like FRT are designed around automated sorting, classification, and behavioural prediction. These capabilities that naturally invite expansion into new governance functions once deployed as they align with the needs of marketing, or policing.

⁴⁰ See page 5-6, *infra*

⁴¹ Brett Hutchins and Mark Andrejevic, 'Olympian Surveillance: Sports Stadiums and the Normalization of Biometric Monitoring', *International Journal of Communication* 15 (2021) 363–382
<https://ijoc.org/index.php/ijoc/article/view/16377>

Stadiums function as testing grounds for surveillance normalisation. Once embedded, it can be hard to roll them back. Decisions made in sport shape a broader public acceptance of biometric governance and civil liberties erosion. They also harm the very function of large-scale sporting events as places for expression and enjoyment.

How can a culture flourish if it is being burdened with the threat of surveillance at such an important meeting point?

The stakes are high.

WHAT THIS MEANS FOR FOOTBALL IN THE UK

The UK Premier League has, to date, avoided deploying FRT at stadium turnstiles or for fan management. This caution likely reflects a convergence of legal uncertainty, fan opposition, cost constraints, reputational risk, and unresolved governance concerns around the use of biometrics. Considering international evidence on mission creep, harms and regulatory pushback, this restraint appears justified and strategically important.

Fan backlash

Football in the UK is deeply embedded in community identity, collective memory and democratic expression. This is evident in fan-led mobilisations such as the widespread protests against the European Super League in 2021, where supporters gathered at stadiums to challenge club decisions and successfully forced a reversal⁴². Stadiums also function as spaces for ongoing political expression, including protests against club ownership⁴³ and long-standing justice movements such as the Hillsborough campaign⁴⁴. In this sense, football grounds operate not only as sporting venues but as civic spaces where collective voice, dissent and democratic participation are exercised

⁴² Sean Ingle, Peter Walker & Nick Ames, *European Super League collapsing as six English clubs withdrew*, The Guardian (21 April 2021) <https://www.theguardian.com/football/2021/apr/20/european-super-league-unravelling-as-manchester-city-and-chelsea-withdraw>

⁴³ Simon Stone, *Thousands of Man Utd fans protest against owners*, BBC, <https://www.bbc.co.uk/sport/football/articles/c5y40x9nkv9o>

⁴⁴ Judith Moritz, *Hillsborough Law – what is it and how did we get here?*, BBC, <https://www.bbc.co.uk/news/articles/c98d930p50no>

In 2024, Premier League crowds were due to surpass 14.8 million people, with stadium occupancy rates hitting a staggering 97%⁴⁵. It's a huge part of the UK.

The Football Supporters' Association (FSA) has formally opposed the use of facial recognition at stadium turnstiles unless transparency, meaningful consultation, and legal clarity are achieved⁴⁶. Introducing biometric surveillance without consent risks fan mobilisation, media scrutiny, and long-term reputational damage to such a large part of the UK's cultural identity.

Legal Uncertainty

The UK currently lacks a comprehensive framework governing live FRT. The Court of Appeal ruling in *R (Bridges) v South Wales Police* identified insufficient safeguards, yet deployments continue under internal policy rather than legislation.⁴⁷ International regulators increasingly reject stadium FRT, as we've seen in Europe, increasing future legal exposure for clubs.

Policing, FRT and Football Banning Orders

In an attempt to understand the relationship between FRT and Football Banning Orders, which can be issued to an individual who has committed a 'football related offense' within the 24 hours prior to or following a match, and which can have far reaching impacts beyond the inability to attend football matches⁴⁸, PI submitted Freedom of Information Act Requests to eleven police departments.

⁴⁵ *2024 Sports Attendance Review – UK Edition*, Two Circles (12 December 2024)
<https://twocircles.com/gb/articles/2024-sports-attendance-review-uk-edition/>

⁴⁶ *Facial recognition turnstiles: why supporters should be concerned*, Football Supporters Association (27 June 2025),
<https://thefsa.org.uk/news/facial-recognition-turnstiles-why-supporters-should-be-concerned/>

⁴⁷ *Facial Recognition Technology Spells The End of Privacy in Public*, Privacy International (7 November 2023)
<https://privacyinternational.org/long-read/5155/uk-mps-asleep-wheel-facial-recognition-technology-spells-end-privacy-public>

⁴⁸ *Banned football fan in passport legal wrangle*, BBC News (3 July 2024)
<https://www.bbc.co.uk/news/articles/cj50r6j7pzro>

We selected departments in jurisdictions with a high number⁴⁹ of football banning orders, and asked about:

- the number of live FRT deployments outside of football matches;
- the number of arrests made in connection to these deployments of FRT;
- what football banning lists are used for;
- and whether the departments have documented instances of misidentification.

North Wales Police, South Wales Police, and the Metropolitan Police confirmed that they do deploy FRT outside of Football matches, and the North Wales Police confirms in its Live FRT Policy that they do consider football banning orders⁵⁰ when creating bespoke watchlists for FRT deployments, meaning that individuals on FRT watchlists could be identified and theoretically, prevented, from attending football matches.

Overall, though, the responses were characterised by a lack of record keeping. The Met Police wrote that it would be too costly to determine the number of arrests made as a result of FRT associated with football matches and similarly did not know how many such arrests led to football banning orders. The South Wales Police gave a similar answer, noting that the SWP has used live or retrospective FRT on over 14,000 occasions since 2023.

This lack of record keeping is concerning for three reasons. First, the very fact that FRT has become so commonplace that the Met Police and SWP hold quantities of data too vast and disorganised to search in a timely fashion raises concerns about

⁴⁹ Home Office, *Football-related arrests and banning orders: England and Wales, 2024 to 2025 domestic football season* (17 July 2025) <https://www.gov.uk/government/statistics/football-related-arrests-banning-orders-202425-domestic-season/football-related-arrests-and-banning-orders-england-and-wales-2024-to-2025-domestic-football-season>

⁵⁰ North Wales Police, *Live Facial Recognition: Policy Document* <https://www.northwales.police.uk/SysSiteAssets/media/downloads/north-wales/north-wales/about-us/north-wales-police-live-facial-recognition---policy-doc.pdf>

the speed with which this technology has been deployed. Second, this inability to respond to our questions undermines principles of transparency. Finally, and most significantly, one of the justifications that UK police have given, time and time again, for using FRT is to secure large public events like football matches. But without statistics tracking the use of FRT in connection with these events, neither the police nor the public can properly understand the effect FRT is having on football matches, and the public cannot meaningfully challenge the practice.

CONCLUSIONS

The global expansion of FRT across sport reveals a consistent and troubling trajectory. What begins as a promise of convenience, efficiency or safety has rapidly evolved into systems of identification, exclusion and control. Across North America, Europe, Latin America and the Middle East, stadiums have become testing grounds for biometric surveillance, often preceding wider deployment and outpacing oversight.

Football occupies a uniquely powerful position within this ecosystem. It is not merely an entertainment industry but a cultural institution, a site of collective identity, political expression and social belonging. Decisions made within football do not stay within football. They shape public expectations about surveillance, consent and the boundaries of acceptable monitoring in everyday life. When biometric surveillance becomes normalised in stadiums, it's easier to justify greater expansion into transport systems, city centres, protests and public space more broadly.

The Premier League's current restraint in adopting FRT reflects an important recognition of these risks. Legal uncertainty, fan opposition, weak business justification and reputational exposure have, so far protected fans from the harms that come from biometric monitoring.

Given the availability of less intrusive alternatives to FRT in all aspects of football - policing, ticketing, entry - the deployment of the technology in the sport can not be justified.

The choices made now will shape not only the future of football, but the broader relationship between citizens, technology and power in everyday life.

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