



Mr Lewis Cox
Data Protection Officer
Sheffield Wednesday Football Club Limited
Hillsborough
Sheffield
S6 1SW

1 August 2025

Dear Mr Cox,

Potential use of facial recognition technology by Sheffield Wednesday Football Club Limited (“Sheffield Wednesday” or the “Club”)

Introduction

1. I write on behalf of the Sheffield Wednesday Supporters’ Trust (the “**Trust**”) in relation to the above referenced matter. The Trust was deeply concerned to learn from SAG meeting minutes obtained by an FOI request to SCC that, for the 2025/2026 season, Sheffield Wednesday may be intending to deploy facial recognition technology (“**FRT**”) at home fixtures at Hillsborough.
2. As I’m sure you are aware, the use of FRT raises significant legal, regulatory and ethical concerns. It is vital, therefore, that Sheffield Wednesday is transparent with fans regarding any planned deployment of this technology ahead of time, so that all fans can be reassured that Sheffield Wednesday’s actions are consistent with its regulatory responsibilities and, ultimately, taken in the best interests of fans.
3. In light of the above, I have set out below the fundamental questions which the Trust believes must be answered publicly by Sheffield Wednesday if FRT deployment is planned. Given the first home fixture of the new season is fast approaching, the Trust respectfully asks that written responses to these questions are provided no later than **5 p.m. on 1 August 2025**. If, in fact, there are no plans to deploy FRT at Hillsborough, the Trust asks that Sheffield Wednesday confirm this publicly as soon as possible (and, in any event, by the deadline referenced above).

Questions regarding the background to potential FRT deployment

4. At a time of significant anxiety for supporters of Sheffield Wednesday on a number of fronts, it is more important than ever that the Club is transparent with its fanbase, particularly in relation to important issues such as FRT. With that in mind, the Trust asks that Sheffield Wednesday answer the following questions regarding the background to the potential deployment of FRT:
 - a. In simple terms, what type of FRT framework does the Club intend to deploy (e.g. live or retrospective, fully automated or human assisted)? Is it to be used across Hillsborough, in certain areas of the premises only or a mixture of the two
 - b. In simple terms, what outcome is intended to be achieved through the deployment of FRT as described in this letter?
 - c. When was deployment of FRT proposed and by whom?
 - d. Which personnel within the Club have been involved in evaluation of the deployment of FRT and progression of this proposal? Please provide job titles only, rather than personal information relating to individuals.
 - e. How much has Sheffield Wednesday spent on exploring the deployment of FRT to date and what future cost is budgeted if plans are implemented as currently envisaged?
 - f. How have costs incurred to date been funded, and what is the plan for funding future expenditure in relation to FRT?
 - g. Which third parties (e.g. external consultants, technology providers), if any, have been involved in the implementation of any FRT proposal to date? How were these third parties identified and engaged?
 - h. What is the expected timeframe for implementation of any FRT proposal? What are the key milestones for the proposal and when are they expected to be achieved?

Questions regarding the deployment of FRT in the context of the UK GDPR and DPA 2018

5. As we trust you are aware, the use of FRT necessarily involves the processing of biometric data of the persons surveilled under the UK General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018 (“**DPA 2018**”). This classification imposes strict requirements under these legislative frameworks,

and the Trust asks that Sheffield Wednesday answer the following questions in this regard:

- a. For the purposes of UK GDPR and DPA 2018, what legitimate purpose does Sheffield Wednesday consider will be served by the deployment of the FRT proposed? Has the Club considered whether this could be achieved by less intrusive means?
- b. How is personal data to be collected by the use of FRT and what categories of personal data will be collected?
- c. Where will personal data collected through deployment of FRT be stored and by whom? Will the FRT system require sharing of personal data with any third parties? For how long will data collected be stored?
- d. Has the Club conducted a data protection impact assessment (“**DPIA**”) regarding the proposed deployment of FRT? If so, will the Club make this publicly available to those who may be subject to FRT?
- e. What has been done to assess the risks to individual’s rights and freedoms which might arise from the use of FRT? How were those risks identified and what measures are to be taken to mitigate them?
- f. To the extent relevant, what diligence has been conducted on the parties who will be involved in the deployment of FRT (e.g. third-party service providers, data storage providers)?
- g. How will consent be sought from those whose personal data will be processed by way of the use of FRT, prior to its use? If consent is withheld, how will this impact the persons concerned?
- h. Will the deployment of FRT involve the transfer of personal data outside of the UK and, if so, on what lawful basis is this to be effected?
- i. Relevant case law has emphasised the importance of users of FRT undertaking regular assessments to ensure the accuracy and reliability of underlying data¹. What policies and procedures does the Club propose to implement to satisfy this requirement?

¹ Regina (Bridges) v Chief Constable of South Wales Police (Information Commissioner and others intervening) - [2020] 1 WLR 5037

- j. If the FRT proposed utilises artificial intelligence capabilities, what role will these play and how will the proper operation of these in accordance with data protection requirements be ensured?

Questions regarding the wider ethical implications of FRT use by Sheffield Wednesday

6. We trust the Club recognises that the use of FRT by any organisation is a matter of public interest, given its potential implications for the rights and freedoms of members of the public and the potential precedential value of its adoption. This concern is even more pronounced when the proposed use is by a private organisation privy to large amounts of personal data relating to a large number of the public and in respect of which there are pre-existing concerns regarding corporate governance and stakeholder engagement. With that context in mind, the Trust asks that Sheffield Wednesday answer the following questions:
- a. So far as the Trust is aware, the deployment of FRT at Hillsborough by the Club would constitute the first formalised² adoption of such technology in English professional football.³ What unique characteristics of Sheffield Wednesday does the Club believe merit its deployment at Hillsborough where this has not been considered necessary across other similar organisations?
 - b. Has the Club consulted fans, civil society groups, the Information Commissioner's Office (the "ICO"), or any other public authority or regulator regarding the FRT proposed? If so, what feedback was received and how has this been factored into the FRT deployment design.
 - c. Has the Club considered the potential for FRT utilisation to result in discriminatory outcomes for different categories of fans? How will this risk be mitigated if FRT is adopted?
 - d. Is the club aware of the motion passed at the FSA's 2025 AGM on Saturday 14th June stating that:

This organisation calls for an immediate freeze on facial recognition technology being used at turnstiles or inside stadia until further notice. This should remain in place at least until transparent and meaningful dialogue has taken place at a national level with fans, leagues, the FA, civil rights groups and the Information Commissioner's Office on its legality and privacy concerns.

² I.e. Excluding pilot programmes

³ The EFL confirmed to the Trust in a meeting on 24th July that they are unaware of the use of FRT in any of their 72 clubs.

and that the FSA will run a national campaign to oppose the introduction of FRT?

Next Steps

7. As demonstrated by the scope of the questions above, the potential use of FRT raises a large number of important concerns for fans of the Club. Consistent with this, the Trust encourages the Club to provide full, detailed responses to the above questions and reserves the right to publish responses received so they may be understood by fans and to share them with the ICO, who we expect will take a keen interest in any proposed FRT use.

8. Pending a response from the Club, this letter will be published by the Trust and shared with the ICO. We strongly encourage the Club to consider this letter carefully given the importance of its subject matter and look forward to a substantive response by the deadline specified above.

Yours faithfully,

Sheffield Wednesday Supporters' Trust