European football fans' resistance and protest in the face of legal restrictions: Towards a typology and continued research agenda

Abstract: Scholars have established that European football represents an important domain for protest and resistance. While European football has undergone significant political, economic, and social transformations, football supporters have adopted various tools of resistance when faced with these processes. Legal restrictions and security measures imposed on football supporters represent highly contested areas of football. Although existing case studies affirm this, few attempts have been made to organise the various types of fans' resistance and protest into explorative typologies. Therefore, this article advances a typology of supporters' resistance tactics and strategies in the face of enhanced regulative mechanisms. Specifically, we unpack fanzines/e-zines/social media, symbols and banners, direct protest and boycott, fan congresses and conferences, and linkages with wider movements as resistance tools employed by European supporters. As argued, this typology remains significant as it not solely reveals the breadth and width of fans' resistance but illustrates the repertoires of strategies adopted by actors contesting what is, ultimately, an effort to control them. Relatedly, this article contributes with a continued research agenda relating to processes of juridification and securitisation in football and, broadly, fans' resistant agency.

Key words: Resistance, football fandom, fan activism, legal restrictions, protest.

Introduction

Over time, it has become well-established that football provides socially important and dynamic spaces for resistance and protest. Recently, football supporters' political engagement – particularly in Europe – has been increasingly subjected to sociological inquiry (Fitzpatrick, 2024; Numerato, 2018; Turner, 2023). The importance and (counter-)power of supporter protest was reinforced further by the recent (2021) high-profile case of the anti-European Super League (ESL) protests – contributing to the ESL's collapse (Turner and Millward, 2024) – and other stories of supporter protests, including Norwegian supporters throwing fishcakes and pastries onto the pitch to protest against the video assistant referee (VAR) system; disrupting the relevant games (ESPN, 2024).

While football supporters' activism or protest can be seen as 'sporadic and parochial' (Fitzpatrick, 2024: 3), they also are embedded in long-term struggles across several temporal periods (Turner, 2023). They also relate to different, wider social and political processes or *'-ization*' processes including commercialization, globalization, securitization, mediatization (Numerato, 2018) and, we may add, the enhanced *technologization* of football, represented by VAR.

Crucially, to contest these processes, and their impacts on the consumption of football, supporters across Europe have utilized various strategies and tools of protest and resistance. This paper's purpose, thus, becomes to unpack supporters' resistance toolkits further, utilizing the example of the securitization of any legal restrictions enforced on European football. Supporters' contestations over legal, safety and security measures and issues remain an important element of politically-engaged fan cultures – and have done so since the 1980s following the Heysel and Hillsborough tragedies (Turner, 2023, Numerato, 2018; Author A, Author B; Rookwood and Hoey, 2024). After these events, supporters quickly became subjected to strict regulatory frameworks that, often, proceeded on the basis that supporters constituted security threats (Tsoukala, 2009). This led to heightened surveillance in the stadia and the criminalization of certain aspects and rituals of supporter cultures like alcohol consumption, pyrotechnics, or standing inside stadiums (Numerato, 2018; Turner, 2023).

Whilst the literature has captured – via important case studies – supporters' contestations over these legislative and securitized measures (Author B, 2024a, 2024b; Numerato, 2018), there have hitherto been few attempts to 'step back' and systemize these acts of resistance, and how they are articulated or expressed, according to what Giulianotti (2002) called 'ideal types'. Whilst different typologies of *supporters* focus on their identities and attitudes toward football governance exist (Giulianotti, 2002; Garcia and Llopis-Goig, 2021), typologies of fans' repertoires, strategies and tactics – under the umbrella of fan protest and activism – remain under-developed.

This article seeks to answer the following research question: Which tactics and strategies do fans across Europe employ in the face of legal and security restrictions? Concerning our approach, this paper adopts an ideal-type approach. This approach is oriented towards the construction of ideal types, which, following Weber's work (1904), concerns itself with finding common characteristics within social phenomena. Essentially, an ideal type exists at the 'very beginning of an investigation and is the conceptually "pure" type or heuristic against which social behavior and cultural change can be assessed' (Segady, 2014: 358). Thus, within an ideal-type analysis, the notion of the *ideal* is viewed as 'something that is constructed, through a process of empirical investigation of things in the world, and it is understood as a social construct that may help our under-standing of the phenomenon under review' (Stapley et al., 2022: 2). Crucially, this allows for some flexibility (cf. Stapley et al., 2022) in the creation of empirically informed, comparative benchmarks that may be elaborated upon or nuanced in future investigations. Yet, we must highlight that ideal-type approaches may produce outcomes

or categories that may appear static or reductionist, because one key principle is to remain concurrently both comprehensive and minimalist (Gerhardt, 1994). Therefore, we acknowledge that our aim here is not to elaborate on *all* forms of resistance within European football, nor provide a 'definite list' of tactics. Instead, our aim relates to *exploratively* working *towards* a typology which builds upon a discussion and analysis of fans' contention and protest 'repertoires' (cf. Tilly, 1979) that – again – draws upon (i) existing literature, (ii) archived fanzine data, (iii) online sources and (iv) our prior empirical research in the area (Author A; Author B).

Hence, this paper draws upon relevant historical and current cases and examples and the existing literature to *take stock of* and advance a typology of the strategies and tactics supporters have employed to contest legal restrictions and security measures. This exploratory typology – we argue – enhances our understanding of the breadth and width of football supporters' protest and resistance. It also informs a research agenda which this paper contributes with, which highlights again the importance of capturing theoretically and empirically the variations of supporters' protests and their political context. Before mapping out the tactics employed by supporters in their resistance and protest against juridical and security measures, this paper conceptualizes 'resistance' and unpacks the literature on the *political* football supporter. Overall, we contend that this article remains significant as it contributes to our understanding of the tactics and strategies politically engaged actors utilize in face of attempts to regulative and social control mechanisms.

Conceptualizing 'resistance' and the 'resistant football supporter': Taking stock of the existing research

> Doubtless the coming days will bring some clarity, as well as plenty more confusion. Resistance will come in many forms: protests, boycotts, strongly-worded radio phone-ins, the inevitable rebuke from a toothless parliamentary subcommittee (Liew, 2021).

Writing immediately after the ESL break-away proposal's announcement in April 2021, it is noteworthy that *The Guardian's* Jonathan Liew saw *resistance* as an inevitable process following the desire to transform European football. For decades, social scientists have documented the wider processes that have transformed European football. Collectively, this has provided an improved understanding of an increasingly professionalized, industrialized (Alpan and Tanıl, 2023), globalized (Millward, 2011) and commercialized (King, 1998) European 'football industry', since the 1980s and 1990s, that has undergone an evolution where

broadcasting and sponsorship revenues have transformed the economic stakes and governance of the European game.

However, against these large-scale social changes, it remains important, as Alpan and Tanıl (2023: 257) remind us, that '[t]he industrialisation of football is not an automatic and inevitable process, and it creates its own tools of resistance for supporters'. Nor is it a homogenous process that occurs identically in all countries. Hence, mirroring the argument that the study of resistance has become a burgeoning area of study as '[p]rotesting, agitating, dissenting and occupying, *inter alia*, have received increased analytical attention and theorisation in the past tumultuous decade' (Odysseos et al., 2016: 151), the study of football supporters has also recognized supporters as more than 'mere' consumers of football (Garcia and Llopis-Goig, 2021).

Since 2011, it is possible to observe the rise of several movements making claims related to anti-austerity, anti-racism and pro-democracy (Ibrahim et al., 2023). Other protests have revolved around, inter alia, anti-vaccination calls, (in Covid-19's context) or calls for stricter border controls. Despite the many instances of mass risings, protest, and contentious politics in the 2010s and 2020s exemplified by the Arab Spring and Black Lives Matter (Abrams, 2023), defining 'resistance' remains a challenging task (Lilja, 2022). Early understandings of resistance emphasized its organized opposition to power (Ortner, 1995), Lilja and Vinthagen (2018: 211), indeed, highlight the conceptual width of 'resistance':

> Resistance is about forming assemblies, individual protests, manipulations or it can be about desperately opposing one's precariousness. It involves power relations, violence and our political, physical and social environments. The performances of resistance might be played out by individuals or groups in local, national or transnational spaces. Resistance embraces many different forms of activity that might combine in different ways: organized or non-organized, violent or nonviolent, sometimes constructive and invisible, or it might be grand, hindering or up-scaled.

In the context of politically engaged supporters, this poses certain questions about whether resistive acts are essentially opposed to issues or power relations within football or, more widely, in political spheres. Numerato's (2018) influential distinction between activism *in* and *through* football becomes useful here – whereby the former concerns primarily issues specific to football (e.g., atmospheres, club owners, stadium security) and the latter concerns the use of football becomes a site to address wider socio-political issues (e.g., climate change, general security trends, food poverty), as football-based social movements, increasingly, have directed their activism toward wider social changes externally positioned to sport (Fitzpatrick, 2024).

Building on this logic – but avoiding a conceptual conflation of 'activism' with 'resistance' – we suggest that one, similarly, can speak of resistance *in* and *through* football.

In the sociology of sport, some researchers noticed the growth of fan activism already in the 1990s (Nash, 2001; King, 1998). Over the following decades the literature not only grew in the UK context (Millward, 2011; Fitzpatrick and Hoey, 2022) but was able to capture similar processes across the continent in, for example, Italy, Croatia and the Czech Republic (Hodges and Brentin, 2018; Numerato, 2018; Testa, 2009). It is particularly revealing that some of this work also has appeared in mainstream political and sociological outlets, underlining the topic's broader sociological importance (see Turner and Millward, 2024; Amann and Doidge, 2023; Fitzpatrick, 2024).

Activism and resistance expressed by fans are interconnected with broader transformations occurring within football and the wider context in which football operates. The contemporary transformation of football cannot be understood solely only through its structural aspects. Football functions as one element within a complex web of interdependencies shaped by the political economy of contemporary capitalism. The influence of market forces in football extends beyond phenomena such as foreign investors' taking over local clubs—a trend notably prevalent in the UK, but increasingly affecting the entire European continent. This influence must be viewed more broadly, for instance, the tightening of regulations surrounding football matches and the establishment of protection and surveillance systems that resemble a police state are also facets of football's transformation aimed at aligning football with economic market demands.

These changes are designed to render football a consumable entertainment akin to experiences offered by other domains of consumer culture, which have already undergone significant securitization to prevent behaviours that exceed consumer obligations. To achieve this state, it is crucial to limit fans' ability to express sentiments and behaviours for which they have historically been known—such as vulgarity, tribalism, and antagonism—as well as critical sentiments tied to local identity, which stand in opposition to globalizing forces that commodify football. Hence, in Europe, the securitization of football is characterized by the 'rapid spread of security technologies, measures and strategies to monitor and control diverse social spaces' (Numerato and Giulianotti, 2018: 339).

Against these macro-processes, it is justifiable to analyse fans' responsive activities within the framework of a relational approach (Cleland et al. 2018), wherein fans operate as actors within

relational social networks. This perspective also supports examining fan activism, as mentioned, both in its manifestations in and through football (Numerato 2018) — although fan activism more frequently pertains to issues in football. From a sociological standpoint, it is acknowledged that activism and protests by fans *in* football can and should be analysed within a broader, non-football context. Consequently, the spontaneous, informal movement known as 'Against Modern Football', which has expressed itself across various European countries, exemplifies a protest against phenomena occurring within football that are, in fact, consequences of pressures stemming from the political economy of capitalism. Particularly vocal in their opposition to 'modern football' are ultra fans (Doidge et al., 2020), who are responsible for stadium performances and adhere to the so-called *Mentalita Ultras*—an ethos that contradicts the market demands imposed on fans by football corporations. Football bodies' operations, then, not only have a legal character but can be considered as a modern form of a "civilizing offensive" in which popular and traditional mentalities, identities and behaviours are normatively problematised by authorities and actors in the upper orders of society' (Flint and Powell 2014: 71).

Another form of activism and resistance identity encompasses various political ideas—often unrelated to football. For instance, some supporter groups in Central and Eastern Europe express right-wing sentiments that 'debate' progressive and liberal narratives, particularly regarding approaches to refugees and sexual minorities (Author A, 2023). In other cases, we see that some leftist groups are also involved in activism in numerous stadiums across Western Europe (Doidge et al., 2020). This represents an example of activism through football, where the media visibility of football is leveraged to promote values that extend beyond the sport itself. Such activism encounters a strong backlash from football authorities, who suppress any attempts to introduce political content into stadiums.

A crucial element in the context of studying fan activism and protests is identity, which not only conditions but also evolves over time as fans engage in protests. Despite national and local differences (Spaaij, 2007; Numerato, 2018), fans across Europe exhibit a similar resistance identity, characterised by qualities such as a strong sense of "We", social cohesion, solidarity, locality, and a sense of moral ownership of their club. This identity is further reinforced by the carnival-like, spontaneous nature of fandom—expressed through alcohol consumption, obscene behaviour, and occasionally acts of violence. A key characteristic of football as a sport—antagonism towards rivals—intensifies this fan identity, aligning with Lewis Coser's

(1964: 38) classical perspective that 'conflict with other groups contributes to the establishment and reaffirmation of the identity of the group and maintains its boundaries against the surrounding social world'. This conflict is becoming increasingly significant in an era of heightened societal sensitivity and intolerance towards fan behaviour and culture. Although this aspect requires separate analysis, it necessitates a broader examination of fan culture within the context of evolving societal norms and civilizational processes (Brick, 2000).

However, despite certain patterns of convergence, such as solidarity and identity, protests against legal restrictions and security measures must adopt different forms than those adopted in confrontations with supporters of opposing teams. Fans' struggles are also marked by the fact that – despite European and EU authorities' attempts to converge their legal responses to football crowd issues – these have been implemented differently in national contexts (Tsoukala, 2009). Since the 1980s, law enforcers and football and political authorities across European countries have regularly justified the adoption of security and legal measures in terms of the need of controlling football violence and disorder, especially the threat of 'football hooliganism'. Such measures, thus, have been framed in terms of public safety and security and violence prevention (Tsoukala, 2009).

While scholars, hitherto, has mostly focused on different issues that supporters have resisted and the utilized strategies *within* these cases (e.g., all-seated stadiums, pyrotechnics, harsh policing, or the criminalization of supporters; see Turner, 2023; Numerato, 2018; Author B, 2024), few attempts have been made to step back to organize the various forms of resistance and protest into explorative typologies. Indeed, as demonstrated next, fans resort to various types of resistance in their struggle against systemic imperatives.

Mapping supporters' tactics in the face of legal restrictions and security measures

Next, we describe and unpack our typologies of supporters' resistance in the face of legal restrictions and security measures in the European football context. Focusing on the period from the 1980 to date, the article therefore builds on Numerato's (2018) points regarding the variety of ways in which football fans' opposition to contemporary football cultures have been articulated:

> While some fans would establish fan associations and are available to sit at a round table with football and political authorities, other fans would keep their resistance strictly conflictual and limit their expression of discontent to complaints, protests, manifestations, banners, boycotts, stickers in urban spaces, chants or to unofficially created fanzines or e-

> zines. Football fans have only recently started to use more sophisticated tools of contention, which would rarely have been part of their resistance in the past. More specifically, they started to organize official formal meetings, workshops and conferences, authored open letters addressed to corporations and authorities (p. 26).

Yet, while Numerato provides insights into diverse *resistance toolkit* possessed by supporters across Europe, we build on this by, more precisely, deciphering and elaborating upon these through a typology in the specific context of legal restrictions and security measures, using diverse European contexts and updated exemplars to underpin this. As mentioned, 'resistance' tactics embrace various forms of activity and visibility (Lilja and Vinthagen, 2018). As seen above, the different tactics or strategies differ in terms of their levels of informality/formality and spontaneity/institutionalization. What is more, they also vary in their location inside/outside stadiums. Their existence and dynamics along these lines, therefore, warrant unpacking.

Hence, we outline these ideal types of resistance, using relevant examples, and describe and unpack (1) *fanzines, e-zines and social media*, (2) *symbols and banners*, (3) *direct protest and boycotts*, (4) *fan congresses and conferences* and (5) *linkages with wider movements*.

Examples are drawn from the (1) available literature situated at the intersection between the sociology of sport, social movement studies, and political science, (2) fanzine archives (including the British Library's fanzine collection) and (3) web sources such as fan groups' campaigns or websites, including European-wide (e.g., FSE) and nation-wide fan groups. The discussion, thus, is based on exemplars from English, Scottish, Polish, German, Ukrainian, Portuguese and Italian, Turkish contexts. Whilst we accept that this may not be an exhaustive or totalized list of *all* resistive actions supporters in Europe have taken in the relevant context – which is not an uncommon caveat when developing ideal types, typologies or taxonomies – we again emphasize our explorative aims while also inviting further work that builds upon our typology and, importantly, complements our own insights, while stretching it to other football contexts beyond Europe. This is particularly important because football supporter activism and the securitization of football is not exclusively a European-wide phenomenon as studies from, for example, the US (Henderson and Nyaupane, 2024) and Brazil reveal (Dubal, 2010).

Fanzines, e-zines and social media

One of the earliest types of resistance that football supporters displayed was through the publication of football fanzines. Fanzines, in several European contexts including, *inter alia*, the UK, the Netherlands, Poland, Turkey and Germany (Author A, 2023; Millward, 2008; Spaaij, 2007), became important social forums where supporters of different clubs debated

club-specific questions but also wider political and social issues impacting football (Giulianotti, 2002). Across Europe, fanzines emerged in the 1980s, but gained popularity in the 1990s – and quickly established an alternative and underground football culture, seeking to defend football not solely from the forces of commercialization, but the media and, most central here, security and legal restrictions imposed on supporters (Haynes, 1995). Following Jary et al. (1991), we can therefore understand football fanzines – commonly produced via photocopiers, small presses and homemade – as cultural contestations and sites of resistance. Others emphasize fanzines' role as a 'platform for a critique of mainstream football' (Numerato, 2018: 3) – including securitization processes.

British fan cultures present one potent example here as many fanzines, despite club rivalries, converged in their opposition to the Thatcher government's proposal of a supporter ID card, but also the wider conflation of supporters as 'hooligans' following the 1985 Heysel and 1989 Hillsborough tragedies (Millward, 2008). Some fanzine writers would, in this case, draw attention to the issues the ID Card would bring about speaking to commercial exploitation, supporters' civil liberties considering the associated collection of personal data, as well as their club's finances upon implementing the stadium technology to read the cards (Author B, 2023; Numerato, 2018). In other UK fanzines, we see how writers and editors – such as in the case of a Cardiff City fanzine below – drew attention to how the enhanced regulation of supporter cultures in the 1980s reinforced the view of supporters as a group requiring ever-expanding measures such as the ID Card:

> It has come to our attention that a couple of the fans who were arrested at Fulham recently, have been charged with being 'drunk at sports ground' […] more ammunition no doubt for the Government and the justification of the introduction of I.D Cards (*Watch the Bluebirds*, 1990: 13).

In the British case, the ID card proposal was eventually abandoned – in part due to supporters' discontent (Numerato, 2018). Here, the fanzine movement also grew in parallel with the set-up of the Football Supporters Association (FSA) (Turner, 2023) leading to more organized forms of fan activism. Whilst fanzines' popularity and their resistive power have been reconfigured by the emergence of social media and online message boards providing new avenues for supporters' resistance (Millward, 2008) they, nevertheless, represent an important type of fans' resistance that allow for tracing historically supporters' alternative discourses surrounding legal and security restrictions in different European countries, as fanzines have served as a platform of resistance in other countries, too.

For instance, in Poland, fan reactions reached a boiling point in the early 2010s when a significant conflict arose between fans and Prime Minister Donald Tusk. This period, coinciding with preparations for Euro 2012, saw the introduction of numerous restrictions, including amendments to the Law on the Safety of Mass Events. Fan publications were filled with countless critiques of these changes. In Poland, however, fanzines failed to effect any change in government policy, and the restrictive laws became increasingly burdensome for fans in subsequent years (Author A).

Despite the pervasive influence of the Internet, the fanzine culture in Germany remains robust. Some German fanzines, sticking to their traditional roots, are actively involved in issues that matter to fans. This was evident in the 2012 campaign against the Secure Stadium Experience act. Fanzines like *Erlebnis Fussball* (Brandt and Hertel, 2015) chronicled the protests of fans from various clubs against this law. Similar themes are explored in Germany's largest fanzine, *Blickfang ultra*, highlighting the ongoing relevance of fanzines in the digital age.

The online fanzine *Faszination Fankurve* has also played a significant role in reporting fan activism and protest. Brandt et al. (2023) analysed 2,087 documents published by *Faszination Fankurve* between 2014 and 2021, focusing on fan activism. Among the thematic threads related to the reasons for activism was 'security measures and policing' (a topic in 10% of the analysed documents). The authors also identified a category of 'tactics', which included codes such as 'choreographies/banners', 'donations', and 'boycotts' (these tactics could have various origins, not only in connection with security measures).

Despite the continued existence of print fanzines, online magazines or e-zines (cf. Millward, 2008), websites and social media have assumed an increasingly significant role as mediators of fan resistance and protests. This was evident in Ukraine, where online fan activism spaces were used to publish a protest in 2017 (directed at the then-president Petro Poroshenko) against the Ukrainian Football Association's plans to require passports for purchasing match tickets. The protest statement was supported by fans from 25 clubs (Brandt et al., 2024). Importantly, social media platforms are also utilized by supporters in different ways to resist or draw attention to restrictive measures and construct counter-narratives. This includes, for example, uploaded video footage on social media, drawing attention to the heavy-handed policing supporters may be subject to – exemplified by the case of the 2022 UEFA Champions League final in Paris (Rookwood and Hoey, 2024).

Symbols and banners

A key dimension of European football fandom is its performative nature. While traditional forms of fan support vary across regions, the ultra-culture, characterized by choreographies, flags, and pyrotechnics, is prevalent in many European countries (Doidge et al. 2020). To analyse these fan performances, we can draw on Jeffrey Alexander's (2006) theory, which argues that cultural performances are crucial tools for representing a group's core values. Through performances, fans primarily promote values related to group and local identity, as well as their attachment to the club. In many countries, choreographies address fans' political beliefs and serve as a means of protest authorities' decisions and restrictive security measures.

Banners and choreographies possess a powerful communicative force, as images of these performances are widely disseminated through social media. Fans view them as a means of communicating with the wider world, including demonstrating their resistance identity. In response, some governments have implemented restrictive laws aimed at controlling fan behaviour. For example, in 2007, Portugal introduced legislation requiring any group wishing to present a choreography with its own name in a stadium to register. In response, some groups adopted the name 'No name Boys' to circumvent these regulations and continue their activities as before (Doidge et al., 2020: 168). Thus, banners have become a means of expressing an anti-law, anti-authority identity.

Furthermore, pyrotechnics have emerged as a significant symbol and tool of protest and defiance within football fan cultures (Doidge et al., 2020). Initially employed to reinforce ultra values (e.g. as Dutch supporters state, pyrotechnics are an integral part of fan culture and a crucial element in creating a dynamic and engaging matchday atmosphere; see Merkelbach et al., 2021), pyrotechnics have evolved into deliberate provocations against authorities. Moreover, given their illegality in most countries, successfully lighting flares without facing charges is often perceived as a victory over both legislative and commercial restrictions. For instance, Legia Warsaw fans intentionally provoked UEFA by displaying a banner that read 'UEFA' at the top and 'Ultra extreme fanatical atmosphere' at the bottom, highlighting their understanding of the organization and then proceeding to use hundreds of flares. Legia Warsaw fans were also actively involved in protests against Donald Tusk's government policies that, as mentioned, introduced restrictions on fans in the context of Euro 2012. During this period, many Polish stadiums displayed banners and choreographies with messages such as: 'Donald, you moron, fans will bring your government down'. Another example was 'Project Euro 2012—stadiums: overpaid; highways: won't be there; railway stations: a splash of paint;

airports: provincial; players: weak; red herring: football fans; the government: satisfied' (Author A). While these banners and choreographies garnered media attention, they failed to stimulate broader public discourse on fan restrictions, and the implemented security measures remained intact.

A similar campaign, in terms of nationwide scale, was launched by Italian ultras, who set up a nationwide initiative involving the display of banners and choreographies in response to the introduction of the *tessera del tifoso* (fans' membership card linked to a national database). This card was mandatory for attending matches and purchasing tickets. Numerous Italian stadiums featured banners proclaiming *Trasferte libere!* ('Free travels'), as the new system would have prevented fans with stadium bans from entering matches. Given the ultras' core principle of challenging authority and facilitating the entry of banned supporters, the introduction of the card was seen as a direct affront to their subculture (Doidge, 2017).

The restrictive legislation targeting football fans also sparked a wide-ranging campaign among Scottish supporters. Protests against the Offensive Behaviour at Football and Threatening Communications (Scotland) Act 2012, which sought to criminalize certain aspects of fan behavior, took many forms (Lavalette and Mooney, 2013). In addition to a dedicated website and media campaigns, fans displayed numerous banners and choreographies that attracted media attention. In 2017, Celtic Glasgow fans unveiled a banner stating 'Guilty of Criminalizing Football Fans', alongside images of public figures such as the First Minister, her predecessor, the former Justice Secretary, and the Chief of Police Scotland. Celtic supporters also displayed banners reading 'Fans not criminals. Recognize Fans Rights. No to Facial Recognition', in response to the proposed introduction of facial recognition technology in football stadiums.

More recently, in February 2023, banners on the Kop stand at Anfield (Liverpool FC's home ground) also read 'UEFA Liars' and 'UEFA Champions League of Deniers' as Liverpool supporters marked their discontent with UEFA's management of the 2022 Champions League final between Liverpool and Real Madrid less than a year prior (Liverpool Echo, 2023). Prior to, and after the final, Liverpool supporters had been heavy-handedly policed by riot police using tear-gas against the crowds and the immediate response from UEFA and French authorities falsely accused 'late-arriving' supporters for causing these chaotic scenes (Rookwood and Hoey, 2024). Taken together, we may therefore see how the use of banners,

symbols and choreographies, often expressed inside the stadia, has constituted an important way through which supporters mark their resistance towards football's securitization.

Direct protest and boycotts

Whilst large-scale supporter protests, walk-outs or boycotts sporadically occur in face of neoliberal trends – mostly in relation to club takeovers, increased ticket prices or most recently the ESL proposal (Fitzpatrick, 2024; Cleland et al., 2018; Turner and Millward, 2024), it is even less common to see such collective and direct action in response to legal restrictions and security measures in European football. Notwithstanding, there are certain important examples exemplifying how supporters have employed these tactics in face of the hegemonic forces of the police, political and football authorities.

For example, the Hillsborough Justice Campaign that emerged in Liverpool, UK, organized the 'Boycott of Hillsborough' campaign prior to Liverpool's fixtures against Sheffield Wednesday in 1999 to be played at the same stadium where 97 Liverpool fans were tragically killed ten years prior. This followed many Liverpool fans' feelings of provocative policing by the South Yorkshire Police (the same police force in charge of the FA Cup semi-final on the day of the tragedy) over several years, including the confiscations of banners reading 'justice' and flowers tributing the victims of the tragedy. The boycott campaign led to only 14 percent of the allocated tickets being taken up by Liverpool supporters (Hillsborough Justice Campaign, n.d.).

More recently, across Europe, there are other examples of supporters' boycotting matches in a response to legal restrictions and security measures. In the Czech Republic, FC Banik supporters have boycotted home fixtures to protest 'the administrative control tool that would gather personal data' (Numerato, 2018: 15). Meanwhile, the *Passolig* e-ticketing system implemented in Turkey in 2014, which can be understood as a supporter ID card seeking to surveill, tame and discipline football supporters, especially after the Gezi protests (Irak, 2020) – justified by the authorities as a tool to stop football-related violence – has also been heavily criticized by supporters, activists and lawyers. Specifically, fans have been concerned about the collection of personal information, its potential commercial exploitation given the cards' association with a Turkish bank, and how it seeks to design out 'undesirable' behaviours and groups (Alpan and Tanıl, 2023). This led to long-lasting boycotts from football supporters in Turkey that lead to a significant decline in attendance for some clubs (Erturan-Ogut, 2020). On other occasions, supporter protests have intersected with the use of symbolism and banners – such as in the case of Cardiff City supporters displaying their discontent with the use of facial

recognition cameras by wearing Halloween masks and banners reading ‘No Facial Recognition’ (FSA, 2019).

It is also worth mentioning an example from Ukraine, on 9 May 2018, when a joint march was held in Dnipro by fans of Dynamo Kyiv, Shakhtar Donetsk, and FC Dnipro, protesting the mandatory requirement for fans to present their passports when purchasing tickets. This issue also led to a demonstration by fans of Dnipro and Metalist Kharkiv in August 2018. Ukrainian fans feared that their passport data could be accessed by Russian intelligence services infiltrating fan communities (Brandt et al., 2024).

A few years prior, in 2012, German ultras staged a variety of protests in response to the introduction of the Secure Stadium Experience Act. Fans from rival clubs, like Bayern Munich and Augsburg, united in marches, carrying banners (e.g. ‘for the preservation of fan culture’), highlighting the new legislation's negative consequences. Perhaps the most significant form of protest was a 12-minute and 12-second silent protest, symbolising the date the law was implemented (a dedicated website, 12doppelpunkt12.de, had been set to coordinate protests across the country). This unified and highly organized campaign challenged the restrictive law and demonstrated the fans' power to influence the game. The silent protest, in particular, had a noticeable impact, as players complained about the difficulty of playing in a quiet stadium, while the incident also highlighted that fans are not mere consumers, but essential stakeholders in the football spectacle (Brandt and Hertel, 2015).

Through effective coordination, German football fans have demonstrated a remarkable capacity for staging frequent and diverse protests. There were regular protests against the DFB and DFL throughout the 2017–18 season, with ultras contesting the use of VAR and the introduction of Monday night football. Munich fans were also protesting Bavaria’s proposed introduction of the *Polizeiaufgabengesetz* (PAG) to extend police powers to intercept phone calls and text messages, issue preventative banning orders and twenty-eight-day detention for those suspected of violence. Similar protests erupted as the region of North Rhine-Westphalia sought to introduce similar laws. Fans and ultras of Borussia Dortmund, Fortuna Düsseldorf and FC Köln joined forces in a protest on 7 July 2018 in Düsseldorf to challenge PAG. These protests continued into the 2018–19 season in other German cities. While the protests of German football fans might seem reactive to isolated domestic policies, a deeper analysis reveals that they are, in fact, part of a broader global trend of the commercialization and standardization of football. Issues such as VAR, scheduling changes, and increased policing,

which have been the subject of fan protests, are symptomatic of this larger phenomenon called by fans ‘modern football’ (Doidge et al., 2020). Both the Ukrainian and German cases show that while politico-economic factors provide an environment where protest and mobilisation can occur, emotions and a collective sense of belonging are vital when considering fans' motivations. These factors reinforce the argument that fans constitute a strong social movement grounded in collective identity and solidarity.

Compared to boycotts responding to club owners, ticket prices or other commercialized initiatives, there is still scope for assembling more case studies on supporters boycotting fixtures (or competitions) in the face of legal or security restrictions, despite some examples of this (see Erturan-Ogut, 2020). Hence, while the literature typically has captured walkouts, protest marches, or even street protest in face of the game’s commercial transformations such as the ESL (Turner and Millward, 2024) or heightened ticket prices (Cleland et al., 2018), the use of more direct forms of action in face of securitization processes in European football likewise remains an important site of sociological inquiry. And, as the examples from Ukraine, Germany and the UK underscore how it serves as another form of resistance supporters have resorted to.

Fan congresses and conferences

European football fans have been organising themselves in diverse ways for many years. This indicates the fan movement’s maturity and response to modern football’s rapid transformations. Consequently, fans in some countries have established Supporters’ Trusts to save their clubs from bankruptcy (Keoghan, 2007). In more extreme cases, fans have even taken over or founded their clubs as alternatives to those participating in 'modern football' (Perasović, et al. 2024). In many countries, evolving regulations have compelled fans to formalise their activities; without institutionalised associations, they cannot travel to matches or purchase tickets.

Over time, it has become evident that these organizations can play a significant role in dialogue with football authorities. The evolution of institutionalized fan activities has led to the emergence of supra-local, umbrella organizations (Numerato, 2018). A prime example is the FSA (England and Wales), which addresses a wide range of issues, including standing areas in stadiums, climate change, legal support for fans, and football governance. The FSA organizes regular conferences (the most recent on July 2024 at Wembley Stadium). This, importantly, included one panel focused on fans’ rights alongside other sessions on ticket prices and the engagement of supporters, particularly young supporters (FSA, 2024).

The largest European-wide fan organisation is Football Supporters Europe (FSE), whose primary objective is to represent the interests of football supporters across the continent and amplify their voices. FSE engages in numerous campaigns and projects at the pan-European level, focusing on issues such as inclusivity, violence prevention, and governance in football. FSE also organises regular fan congresses, the most recent of which occurred in 2023 and brought together supporters from 27 countries. These congresses provide a platform for fans to discuss issues related to accessibility, particularly considering restrictions imposed by organisers and authorities. By fostering dialogue and collaboration, these congresses enable fans to articulate a unified stance on issues such as policing and securing football matches (Cleland et al., 2018).

Linkages with wider movements

The organization of fan congresses and conferences underlines how supporters' struggles over legal restrictions and security measures have become increasingly intensified and sophisticated. Yet, Numerato (2018: 92) reminds us that despite these changes, 'the impact of critical football fans on the culture of security [in European football] […] remains limited'. In some cases, the enhanced visibility of fans' resistance through 'tools such as protests, chants, banners or demonstrations' have even led to even stronger restrictions placed upon supporters (p. 93). Fans have become trapped in a vicious cycle: the more they protest and the more radical their methods of resistance become, the stricter the restrictions imposed upon them. Football authorities, backed by governments, have developed tools that effectively suppress the most orthodox forms of civil disobedience.

Against this backdrop, it is interesting to observe that some fan groups, occasionally, have joined forced with, and linked up with wider social movements and non-governmental organizations on the civil society level. For example, in English football, the Football Supporters Association's (FSA) campaign *'Watching Football is Not a Crime'* teamed up with the civil rights organization Liberty in order to draw attention to supporters' rights in the face of the use of Section 27 legislation against football supporters which enabled the police to pre-emptively remove individuals from a designated area (FSA, 2008; Author, 2023).

In May 2022, FSE also reported that it was part of a 'global coalition' of 53 civil society organizations that have joined a call for the members of the European Parliament drawing attention to the implications of biometric mass surveillance technologies (FSE, 2022). This followed several incidents, across Europe, where facial recognition surveillance had been used

to monitor football crowds (FSE, 2020) and, importantly, reveals how football supporters acts of resistance in the context of legal restrictions and security measures are not isolated from wider protest fields and, specifically, movements advocating for citizens' civil liberties and rights, and privacy.

Notwithstanding, supporter groups' alignment, and the activation of partnerships, with wider movements, and questions of overlapping memberships, also remain under-researched. A key question would be whether fan groups, often characterized by a strong sense of identity and a degree of isolationism, can overcome these barriers to collaborate with external organizations, as the prevalence of a 'siege mentality' among many fan groups may hinder their ability to form alliances and advocate for their collective interests.

Conclusions and research agenda

Taken together, this article demonstrates how supporters across Europe have resisted a number of legal restrictions and security measures targeting them since the 1980s. Fans have resisted, *inter alia*, football-specific legislation, e-ticketing systems and ID cards, heavy-handed policing, and facial recognition surveillance technologies. As argued, the examples reveal how supporters resist some political elites' discourses, journalistic representations of football fandom and society-wide stances on fans, especially those discourses that reinforce the view of fans' as 'security threats', and enable the general acceptance of the use of football fans as 'test subjects' for new methods of policing and security. Importantly, though, not all political elites' discourses are always countered; in some cases, supporters may seek or receive support from political elites who, for example, become allies of supporters, such as in the cases of Safe Standing or ID Cards (Turner, 2023; Numerato, 2018).

Notwithstanding, the arsenal of resistance tools supporters have resorted to is wide and shares commonalities and differences that can be framed according to their location *inside/outside* stadiums and on a dimension capturing their *informal/formal* nature speaking to the level of institutionalization or spontaneity involved in the relevant act of resistance. This article thus contributes with an understanding of fan protests' socio-spatial and political and institutionalized variances, as demonstrated by our elaboration on fanzines/e-zines/social media (informal/outside); symbols and banners (informal/inside); protest/boycotts (formal/inside); fan congresses (formal/outside) and linkages with wider movements (formal/outside).

Furthermore, considering the proposed socio-spatial and institutionalized axes of analysis, distinct types of fan activism can generate specific categories of engaged spectators. For instance, in the context of formal stadium activism, one might encounter the 'Legitimized/Official Protester' category. In contrast, the prominent figure could be termed 'Fans' Speaker' when examining legal, institutionalised activities outside the stadium. Participants may be designated as 'Illegitimate Performers' when addressing informal activism within the stadium. In scenarios involving informal and spontaneous events beyond the stadium, the actor could be called a 'Guerilla Activist'. These categories require further investigation to understand their existence and significance, particularly regarding the diverse roles in a given context. Notably, not all participants in a protest engage uniformly; thus, exploring these nuances requires additional research.

The important question of what supporters' resistance and protest have *achieved* was not necessarily central to this article's aims. Further, not all the types of resistance covered here have been initiated, necessarily, with the immediate aim of achieving 'something' beyond articulating a critical stance or raise concerns. Yet, our discussion still allows us to elaborate on Numerato's (2018) suggestion that fans' ability to change or counter football's securitization remains limited, notwithstanding the enhanced sophistication and intensification of fan activism in this area. Building on this, we argue that supporters – upon resisting legal restrictions and security measures – face an even tougher uphill battle (compared to e.g., those resisting commercial processes like profit-oriented decisions to raise ticket prices or create break-away leagues) insofar as the measures implemented by football and political authorities upon their framing or justification in the name of 'public safety' and 'security' transcend the normal rules of the game.

Questions of 'security' ultimately remain one area of society that has been impacted by what Habermas (1971) famously called the 'scientization of politics', whereby political issues are framed as so complicated or complex that they can only be addressed and solved by technocrats and experts, rather than through public political debate. This, in turn, means political and football authorities and policing actors can easily quell public opposition by the employment of the security 'trump card' – which means that some implemented laws, new technologies or policies are unlikely to be reversed, notwithstanding fans' opposition. Whilst there are certainly examples of supporters' successfully challenging hegemonic security-related policies, questions about the different typologies of 'outcomes' or 'achievements' must thus keep this in

mind, in addition to the other extant difficulties in determining the 'outcomes' of protest (Cleland et al., 2018).

As demonstrated, the sociological literature – which this article adds to – that has captured football supporters' role as 'political players' (Brandt and Hertel, 2015) or reflexive actors (Numerato, 2018) possessing 'resistant agency' (Fitzpatrick, 2024) in the twenty-first century, has expanded quickly over the last two decades. This was one of the key motivations for this paper's forwarded typology of resistance and protest tactics in the face of legal restrictions and security measures. Ultimately, legal restrictions and security measures collectively constitutes one of the most contested domains of modern-day football fandom and follow the criminalization and securitization of football fandom (Numerato, 2018). In many cases, these measures have jeopardized supporters' civil rights and liberties (Tsoukala, 2009). An enhanced understanding of supporters' deployed tactics in the face of these restrictions, thus, may improve wider understandings of fan protest more widely, as some of the tactics (e.g., protests, boycotts, fanzines, congresses), as demonstrated, have also been utilized in face of other commercially driven processes. Yet, to date a typology *vis-à-vis* security and legal-related resistance has not been developed. Though, as acknowledged, this typology can still be adapted, refined or extended by continued research on supporters across different continents. Although we present 'ideal types', we reiterate that we make no claim that this represents a definite account of all tactics supporters employ. Importantly, this was not our purpose, and we acknowledge that 'different researchers may legitimately construct different ideal types regarding the same phenomena, depending on their context and view of the world' (Stapley et al., 2022: 3). Therefore, scholarly refinement exercises could, for example, consider activities including public relations strategies, petitions or open letters, political lobbying, supporters' petitions or secretive meetings between fan activists and football or political authorities (see Numerato, 2018: 1, 50). This article's intention has not been to downplay these tactics but, rather, accept that our explorative approach means a more definite typology remains a collective work in progress.

Having reviewed the relevant literature and advanced the different types of resistive action that we may extract from this scholarship, there are several areas we outline here that still require further attention by scholars speaking to the creation of alternatives (to 'modern [*securitized*] football'), the significance of political systems and the role of gender. First, one important question concerns how supporters may 'escape' and create 'alternatives' to what they see as restrictive, securitized elite football. Thus, one area requiring research relates to how supporters

may establish their own, democratically run clubs. Such grassroots-level, locally-based clubs offer an alternative to 'modern football', which has stifled spontaneous fan cultures (Perasović et al. 2024). Most research on the establishment of new clubs has been focused on their emergence in light of commercial processes. Yet, it serves as interesting to explore how feelings of a sanitized match-day experience packed with regulatory mechanisms have fed into these decisions. Second, it remains important to consider the importance of political systems in which resistive acts occur – which have big implications on their nature and likelihood of being heard. Specifically, more research is needed on supporter resistance and protest in politically authoritarian contexts. Through the cases of Belarus, Turkey and Hungary, researchers can explore not only which types of legal restrictions and security measures are introduced in authoritarian or non-democratic regimes but also the consequences supporters may face for organizing or participating in protest. Finally, it remains crucial to explore the role of gender in fan resistance and protest. Specifically, we highlight the importance of studying the role of women in the struggle against legal restrictions and security measures *vis-à-vis* their potential roles in fan communities and in the organization and leadership of protests. Overall, in a period characterized by several instances of protest and contentious politics globally (Abrams, 2023), the significance of this article and its lines of research is underpinned by how it reveals the tactics and strategies chosen by political actors within contestations over security and legal restrictions.

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