



Seattle Office of
Inspector General

Biannual Review of SPD Compliance with Chapter 14.12 of Seattle Municipal Code

July – December 2025

June 2026

Objective and Scope

OIG conducted this biannual review pursuant to Seattle Municipal Code 14.12 – ‘Collection of Information for Law Enforcement Purposes’.¹ The objective of this review is to determine whether the Seattle Police Department (SPD) complied with applicable regulations for the collection of private sexual information and restricted information, per the requirements in Seattle Municipal Code Chapter 14.12² for the 6-month period from July 1, 2025 to December 31, 2025.

Chapter 14.12 Overview

Origin of Chapter 14.12

In 1979, the Seattle City Council unanimously passed Ordinance 10833, restricting how the Seattle Police Department could collect, receive, transmit, and use information related to sexual orientation, political affiliation, and religion. The ordinance became Chapter 14.12 of Seattle Municipal Code, Collection of Information for Law Enforcement Purposes. When it passed, Ordinance 10833 was recognized as one of the first local ordinances to restrict certain information collected by police departments. Chapter 14.12 has not been substantially altered since 1982 and prior OIG reviews have found the ordinance is significantly outdated and does not provide sufficient guidance for modern day policing.

Open Recommendations from Prior OIG Review

Review	Recommendation
2023	Seattle City Council, in consultation with SPD and OIG, should amend Chapter 14.12 of Seattle Municipal Code to reconcile Chapter 14.12 and SPD body-worn video policy during protest events.
2023	Seattle City Council, in consultation with SPD and OIG, should amend Chapter 14.12 of the Seattle Municipal Code to provide updated guidance on how SPD may collect and record information without unreasonably infringing upon individual rights. The updated guidance should consider modern technology and more clearly define when SPD must request an authorization to collect restricted and private sexual information.
2025	SPD should implement procedures to ensure that Department personnel will promptly send photographs or videos of demonstrations protected by Chapter 14.12 to the Criminal Intelligence Unit.

1 SMC 14.12.150(E) and SMC 14.12.330(B)(1)(A). The responsibilities of ‘the Auditor’ identified in the Chapter 14.12 were transferred to OIG in the 2017 Accountability Ordinance (Ordinance 125315).

2 This report will refer to the SMC as “Chapter 14.12” or “the Chapter”.

Information Protected by Chapter 14.12

Chapter 14.12 covers two main categories of information: private sexual information and “restricted” information. Private sexual information includes information on an individual’s sexual orientation or sexual practices. Restricted information covers a wide range of information about political and religious affiliations of individuals and organizations (see Figure 1 below). This report uses the term “protected information” to refer to all information covered by the Chapter.

Figure 1: Categories of Information Protected by Chapter 14.12

Information Protected Under Chapter 14.12	
Private sexual information	Information about an individual’s sexual practices or orientation.
Restricted Information	Information about: <ol style="list-style-type: none">1. An individual’s political or religious associations, activities, beliefs, or opinions;2. The political or religious activities, beliefs or opinions, and the membership, mailing, subscription, or contributor lists of certain types of organizations, including political and religious organizations; or3. An individual’s membership or participation in such an organization, in a political or religious demonstration, or in a demonstration for community purposes.

Source: Seattle Municipal Code Ch. 14.030

Before SPD personnel collect restricted information on a group or individual during a criminal investigation, they must have authorization from a unit commander of the rank of lieutenant or above. Authorizations must document that the proposed collection and use of restricted information meets Chapter requirements, such as reasonable suspicion the subject of the information is engaging or will engage in criminal activity. SPD maintains an authorization log that tracks current and historic authorizations. When an authorization expires, SPD destroys the authorization request, leaving the log entry (authorization number and status) as the only form of audit trail.

SPD Did Not Create Any Authorizations Within the Period of Review

Chapter 14.12 requires that SPD notify OIG of each authorization for the collection of protected information, and that OIG review these authorizations along with any related investigative files. The Criminal Intelligence Unit reported they did not create any authorizations for the collection of protected information during the review period of July through December 2025.

Review of Photo/Video Log Found No Violations of SMC 14.12

SPD Policy requires department employees to send original copies of all videos and photographs of demonstrations protected by Chapter 14.12 to Criminal Intelligence. This includes receiving original copies, determining whether to retain or purge in accordance with the Chapter, and maintaining a log of all materials. OIG reviewed the log and found that SPD did not improperly retain any photographs or videos of demonstrations on SPD's digital evidence management system.³

Sample of Department Reports Found No Violations of SMC 14.12

Chapter 14.12 requires OIG to conduct a random check of department files as part of its review. OIG reviewed samples of SPD intelligence unit reports ($n=160$) and general SPD reports ($n=85$) and did not find any violations of Chapter 14.12.

³ OIG is unable to determine whether any photographs or videos were maintained outside of the digital evidence management system, such as on a personal device or a separate shared drive.

Appendix A: Department Response

OIG had not received comment from SPD on this report at the time of publication. This report will be updated as soon as OIG receives one.