

2025-2026
Riverside County Civil Grand Jury



Policy vs Practice:
An Investigation into Riverside County's Workplace
Discrimination Procedures

SUMMARY

The County of Riverside Board of Supervisors Policy C-25, titled “Non-Discrimination and Anti-Harassment Policy and Complaint Procedure,” serves as the County’s official standard for maintaining a professional work environment. The policy establishes a “zero-tolerance” mandate for unlawful discrimination, harassment, and retaliation. It applies to all County employees, including contract workers, volunteers, interns, and elected officials.

The Riverside County Civil Grand Jury (Grand Jury) initiated this investigation after receiving consistent information from County employees expressing concern about the effectiveness of the County’s process for handling complaints of discrimination, harassment, and retaliation under Board Policy C-25. Employees reported submitting complaints to Riverside County Human Resources (HR) with the expectation that the concerns would be investigated in accordance with County policy. Others stated they chose not to report misconduct because they believed the complaint process was ineffective and feared potential retaliation.

Because Policy C-25 applies to all County of Riverside employees—including those working within departments led by elected officials—the Grand Jury determined it was necessary to examine how the policy is implemented across County government. The investigation focused on the procedures used by HR when receiving complaints, the consistency of investigative practices, and the degree to which departments, including public safety agencies, comply with reporting and oversight requirements established by the policy.

Particular attention was given to whether complaints were investigated in accordance with the requirements of Policy C-25 and whether the County maintains adequate oversight to ensure that complaints of discrimination, harassment, and retaliation are addressed in a fair, thorough, and consistent manner.

The findings presented in this report identify significant gaps between the policy as written and the practices described during investigations. These gaps raise concerns about the consistency of investigations, the adequacy of oversight, and the level of confidence County employees have in the complaint process.

While addressing systemic shortcomings, the Grand Jury is steadfast in its support of County of Riverside employees. Their commitment is the backbone of our community. The Grand Jury specifically acknowledges our public safety officials for their service. The findings noted are designed to safeguard County employees by identifying risk and recommendations for the resources and safety measures that they deserve.

Corrective action is necessary to ensure the County provides a safe work environment for all employees and appropriate protections for its public safety personnel.

BACKGROUND

HR is responsible for supporting the lifecycle of the employee. From interviewing, hiring, and onboarding to negotiating union contracts, planning retirements, and investigating issues in the work environment, staff members give assurance to management and the public that HR is in full compliance with federal, state, and local laws and regulations.¹ The Riverside County Board of Supervisors (the Board) established Policy C-25 in 1997 and amended it in 2014 to protect the rights of employees to be free from unlawful discrimination, harassment, and retaliation, and to set forth a procedure for promptly investigating and taking appropriate remedial action in dealing with internal complaints of unlawful discrimination, harassment, and retaliation.² (see Appendix A) For complete text of C-25 Policy see county website.

The primary objectives of Policy C-25 are:

- To protect the rights of employees to be free from unlawful behavior
- To outline specific procedures for reporting and investigating internal complaints
- To ensure prompt remedial action is taken when violations are substantiated

Policy C-25 is designed to ensure County compliance with state and federal laws, most notably the California Fair Employment and Housing Act (FEHA) and Title VII of the Civil Rights Act of 1964. These laws require employers to take all reasonable steps to prevent harassment and discrimination from occurring. The text of Title VII of the Civil Rights Act of 1964 established broad protections for employment based on protected status.³ Under the FEHA, the “employer” is typically the legal entity—the County—not the individual department. California Constitution, Article XI, § 1(b): Grants counties the power to provide for the number, compensation, tenure, and appointment of employees⁴.

California Government Code § 25303 states:

“The board of supervisors shall supervise the official conduct of all county officers, and officers of all districts and other subdivisions of the county, and particularly insofar as the functions and duties of such county officers and officers of all districts and subdivisions of the county relate to the assessing, collecting, safekeeping, management, or disbursement of public funds. It shall see that they faithfully perform their duties, direct prosecutions for delinquencies, and when necessary, require them to renew their official bond, make reports and present their books and accounts for inspection. This section shall not be construed to affect the

¹ [rc-hr.com/employee-labor-relations-division-accessed March 16, 2026](https://rc-hr.com/employee-labor-relations-division-accessed-March-16,2026)

² <https://rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2013-05-C-25-10-28-14.pdf>

³ Civil Rights Act of 1964, Pub. L. No. 88-342 § 703(a), 78 Stat. 241, 255 accessed March 17, 2026

⁴ California Constitution Article XI § 1 - Local Govt <https://law.justia.com/constitution/california/article-xi/section-1/rnment> :: California Constitution :: Justia accessed March 17, 2026

*independent and constitutionally and statutorily designated investigative and prosecutorial functions of the sheriff and district attorney of a county. The board of supervisors shall not obstruct the investigative function of the sheriff of the county, nor shall it obstruct the investigative and prosecutorial function of the district attorney of a county. Nothing contained herein shall be construed to limit the budgetary authority of the board of supervisors over the district attorney or sheriff.”*⁵

Because the Sheriff and District Attorney are County of Riverside officers and their staff are paid by the County, they are generally bound by the County’s employment standards. Courts view these as “neutral” administrative rules that do not interfere with law enforcement. This includes: Anti-Harassment & Discrimination: Rules prohibiting sexual harassment or racial discrimination (Title VII and FEHA compliance) apply to all staff. The courts generally use a “Core Functions” test: If a policy regulates the workplace environment (administrative), it is usually valid. If it regulates how law is enforced (operational), it is usually an unconstitutional interference. There is substantial case law supporting the idea that the Sheriff and DA are subject to “neutral” county administrative policies, provided those policies do not strip them of their core constitutional or statutory powers.⁶ This establishes the County’s central HR and EEO departments as the governing authorities for labor and civil rights compliance.

Under Policy C-25, “protected classes” include but are not limited to: race, religion, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, sex, gender identity, age, or sexual orientation.⁷

Complaint and Investigation Process

A critical component of Policy C-25 is the Complaint Procedure. Any supervisor or management employee who receives a complaint is required to:

1. Provide the complainant with a copy of the Policy C-25
2. Immediately notify the Human Resources Department

County HR (specifically the Employee Relations Division) is generally responsible for conducting these investigations, except for public safety agencies that do their own investigations because of the Police Officers Bill of Rights (POBR) and California Government Code Sections §§3300-3313. The policy mandates that investigations must be thorough, objective, and include interviews with the complainant, and the accused.⁸ See Appendix A for complaint procedures.

⁵ https://california.public.law/codes/government_code_section_25303 California Government Code section 25303 (2025) accessed April 6, 2026

⁶ law.justia.com/cases/california/supreme-court/2024/s265223.html

⁷ rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2013-05-C-25-10-28-14.pdf accessed March 16, 2026

⁸ Ibid

METHODOLOGY

The Grand Jury conducted interviews, reviewed documents, attended public meetings, viewed websites, and communicated with individuals and organizations.

Interviews

- Multiple County Human Resources employees
- Multiple County Human Resources supervisors
- All County departments Human Resources designees
- All Public Safety Agency Human Resources designees
- Multiple County employees from various departments

Document Reviews

- Federal Anti-Harassment Laws
- California Anti-Harassment Laws
- Riverside County Board of Supervisors Policy C-25
- Riverside County District Attorney's Office Memorandum of Understanding
- Riverside County District Attorney's Office Policy Manual
- Riverside County Sheriff's Office Memorandum of Understanding
- Riverside County Sheriff's Office Policy Manual
- Riverside County Probation Department's Memorandum of Understanding
- Riverside County Probation Department's Policy Manual
- 2018-2019 Riverside County Civil Grand Jury Report, "*Riverside County Human Resources Department and Office of Riverside County Counsel*"
- County of Riverside Employee Relations Disciplinary Process Training
- County of Riverside Employee Relations Disciplinary Process Guide
- County of Riverside Claim Frequency and Indemnity Paid Summary (2026)

Communications

- E-mail – Multiple County of Riverside Departments
- Phone – Multiple County of Riverside Departments

Visits

- County of Riverside Executive Office

Websites

- [California Legislative information and Law code=GOV§ion=3303 Num=3303](#)
- <https://cslea.com/legal/peace-officer-bill-of-rights/> Law Enforcement Association
- <https://rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2013-05-C-25-10-28-14.pdf> intent-uploads-2013-05-C-25-10-28-14.pdf
- <https://govt.westlaw.com/calregs/Document/I676D45735A0A11EC8227000D3A7C4BC3?contextData=%28sc.Default%29&transitionType=Default> document - California Code of Regulations
- [California Legislative information sectionNum=12900 & Lawcode=GOV2900 &lawCode=GOV2900.](#)
- [CA Gov Code 12900 &lawCode=GOV.](#)

DISCUSSION

Throughout the Grand Jury's various investigations, a consistent concern was expressed by County employees. Many reported that they had submitted C-25 complaints to HR, while others stated they chose not to report because they believed HR was ineffective and that reporting would serve no purpose and expose them to retaliation. This troubling perception among County employees prompted the Grand Jury to initiate an inquiry.

The Grand Jury began by examining the County's policy and establishing which departments fall under the policy's jurisdiction. The scope is defined within the policy,

*"This policy is applicable to all County of Riverside employees, including, but not limited to, contract workers, volunteers, interns, externs, and elected officials."*⁹

This means all departments, including those operating under elected officials, must comply with Policy C-25.

Throughout multiple interviews with HR personnel who investigate C-25 complaints, investigators described a process in which C-25s are first reviewed for *prima facie* evidence that supports the initiation of an investigation. This contradicts the C-25 policy directive, which states:

⁹ [Ibid](#)

“Upon receiving notification of a discrimination/harassment complaint, the Department head, the Human Resources director, or designee, shall immediately authorize and supervise the investigation of the complaint. The investigation shall, at a minimum, include interviews with the complainant, the accused harasser, and any other persons the Department Head or the Human Resources Director has reason to believe may have relevant knowledge concerning the complaint.”

See Appendix B for C-25 flow chart:

All nine HR employees interviewed stated that the majority of complaints are not investigated. This has been repeatedly referred to by HR staff as the term “80/20 rule”. While generally this term is understood to represent Pareto’s Principle, HR employees interviewed referred to it in a context where 80% of complaints are read in the review process and result in no further investigation being completed. This internally manufactured terminology (unofficial rule) contradicts policy and investigative directives and could also prejudice the investigator towards not substantiating the claims. The Grand Jury requested but did not receive any data substantiating that 80% of the complaints submitted involved only “rude and discourteous” behavior and 20% were considered valid C-25 complaints. Established caselaw states,

“A person is not required to use legal terminology when opposing discrimination, harassment, or other illegal activities at work.”¹⁰

Contrary to Policy C-25, HR internally created a Disciplinary Process Guide (See Appendix B) distributed to County department supervisors, which states, “All C-25 complaints received by the HR are reviewed to determine if a C-25 investigation is warranted.”¹¹ These determinations are frequently based on the characterization of complaints as “rude and discourteous” behavior rather than unlawful harassment or discrimination. However, Policy C-25 makes it clear that harassing conduct may include behavior that is hostile, offensive, or intimidating and does not require extreme or overt acts. All subjects interviewed from various departments affirmed that rude and discourteous behavior can be, or turn into, harassment or a hostile work environment. Dismissing complaints at intake without sufficient fact-gathering (interviews with the complainant, the accused harasser, and any other persons the Department Head or the HR director has reason to believe may have relevant knowledge concerning the complaint) risks overlooking conduct that may fall within the policy’s protections.

When a C-25 complaint comes to the County HR, if it is investigated, is assigned to an HR analyst. In the Grand Jury’s interviews with HR, it was discovered that HR analysts investigating C-25

¹⁰ [Yanowitz v. L’Oreal USA, Inc. \(2005\) 36 Cal.4th 1028, 1047-accessed March 16, 2026](#)

¹¹ [Supervisor and Manager https://rc-hr.com/files/2023-08/Supervisor%20and%20Manager%20ER%20Guides%20-%20\(Revised%20Packet_08.01..23\)%20\(6\).pdf](https://rc-hr.com/files/2023-08/Supervisor%20and%20Manager%20ER%20Guides%20-%20(Revised%20Packet_08.01..23)%20(6).pdf) ER Guides - (Revised Packet_08.01..23) (6).pdf-accessed March 17, 2026

complaints have a different understanding of the policy. All entities reported that the main form of training they were provided was “shadowing” a more experienced analyst.

The Grand Jury further learned that even when a complaint moves past the unofficial “80/20 rule” and an investigation is opened, it is possible that the accused party is never interviewed. Most investigators stated that they were not aware of any policy requirement to interview both parties. Policy C-25 does not provide discretion to decline investigation based on a preliminary judgment about the character or seriousness of the allegations. This unofficial practice is inconsistent with the C-25 Policy’s requirement for fair, impartial, and thorough investigations, which necessarily include providing both the complainant and the accused an opportunity to be heard. Some investigators reported that their workload was “too heavy” to allow them to interview all parties involved, whereas others indicated that their workload was manageable and not a significant source of stress in their role.

It was consistently reported during interviews with multiple individuals from HR and in data received from HR personnel, that C-25 complaints numbered approximately 300 to 400 annually. During the compilation of this report, the Grand Jury received email communication from an individual in HR stating that the data given to the Grand Jury may have been incorrect. It was claimed that the actual number of C-25 complaints averaged around 225 annually, not 300 to 400 as previously reported. However, this statement contradicts the multiple data reports provided to the Grand Jury over the past year of investigation, and also every witness statement obtained thus far including the previous interview statements by this particular individual.

Investigators acknowledged that complainants often provide minimal information in their initial written complaints, with additional details emerging during follow-up conversations. However, the policy does not provide discretion to decline an investigation based on a preliminary judgment about the character or seriousness of the allegations. Complaints based solely on the initial submission are frequently declined for investigation because of the unofficial “80/20 rule,” a practice that conflicts with the policy’s expectation of clarification and follow-up before closing a complaint. By dismissing complaints *prima facie*, HR effectively reverses the policy’s required sequence. Under Policy C-25, the determination of whether conduct constitutes discrimination or harassment is to be made only after factual information has been gathered through interviews and review of all the circumstances.

Harassment often involves patterns of behavior, escalating over time, power imbalances, or conduct that appears minor in isolation but becomes hostile or abusive when viewed collectively. When complaints are screened out individually and without investigation, HR cannot assess whether conduct is severe or pervasive, whether it is targeted, or whether it interferes with an employee’s terms and conditions of employment. As a result, the policy’s substantive protections cannot function as intended. Failure to adhere to requirement to investigate all C-25 complaints may undermine confidence in the County’s ability to monitor compliance, identify patterns, and ensure consistent enforcement of Policy C-25.

In practice, this approach undermines the protective purpose of Policy C-25. A policy that is routinely unenforced discourages employees from reporting concerns, increases the likelihood that misconduct will continue unchecked, erodes trust in the complaint process, and increases liability risk for the County. Employees are less likely to come forward when they believe their concerns will be dismissed without review, particularly where the conduct involves supervisors or ongoing workplace dynamics. If the County hides or discourages these complaints, then the County (as the legal employer) faces increased risk of liability for failing to monitor and correct the behavior. When the Grand Jury inquired about the legal settlement costs for the County, the Auditor Controller's office confirmed that it is not a report regularly completed but referred to one from 2018-2019 that showed Riverside County with significantly higher legal settlement costs than comparable counties. (See Appendix E)¹²

Finally, uninvestigated complaints may later demonstrate that the employer had notice of problematic conduct and failed to act. What was previously characterized as "rude and discourteous" may later be shown to have been part of a broader pattern of harassment or retaliation. In such cases, the failure to investigate earlier complaints becomes evidence of procedural noncompliance with Policy C-25.

The lack of investigation of all submitted complaints renders Policy C-25 largely ineffective in operation. While Policy C-25 may exist on paper, a practice that systematically disregards the majority of complaints prevents proper investigation, fact-gathering, and totality of circumstances review.

After extensive investigation, the Grand Jury confirmed that all County agencies (excluding public safety agencies addressed below), comply with Policy C-25 by reporting complaints to HR.

The Riverside County Public Safety Agencies:

During interviews with personnel responsible for investigating C-25 complaints, the Grand Jury identified significant inconsistencies between stated investigative practices and the requirements of Policy C-25. Even though Policy C-25 permits public safety agencies, including the Sheriff's Department, Probation Department, and the District Attorney's Office, to complete their own investigations internally in accordance with the Peace Officer Bill of Rights (POBR), C-25 does not exempt them from cross-reporting these complaints to HR. In fact, C-25 specifically states that public safety agencies "shall cross-report" C-25 complaints to HR. Statements by HR investigators reflected a lack of awareness of this oversight and reporting obligations, raising concerns about accountability, policy compliance and consistency throughout the County.

¹² [Portals-0-Documents-publications-FinancialPub-asa-reports-asa-reports-FY18-19-20Audit-20Reports-Legal-20Settlement-20Cost-20Report-202013-2017.pdf](#) accessed April 21, 2026

Under Policy C-25, public safety agencies are required to do the following when receiving a complaint:

1. Upon receipt of verbal notification of a C-25 complaint, the public safety agency shall cross-report in writing the name of the complainant(s), name of the accused, allegation(s), and a brief summary of which the complaint is based to the Human Resources Employee Relations Division. The public safety agency will provide a copy of any written complaint received to the Human Resources Employee Relations Division.
2. The public safety agency will conduct the investigation pursuant to the requirements set forth in POBR §3303, for peace officers employed in their departments.
3. At the conclusion of the investigation, the public safety agency shall provide the Human Resources Employee Relations Division with the complaint disposition (i.e. sustained, not-sustained, or unfounded) within 30 working days of the conclusion of the investigation.
4. For investigations conducted by the Sheriff's Department or District Attorney's Office against an employee within their respective chains of command, any disciplinary action taken shall be at the discretion of the department head. However, the level of discipline must be consistent with countywide disciplinary actions taken with similar acts or omissions related to this policy.
5. Pursuant to Penal Code Section §832.7, the completed investigation shall be maintained by the public safety agency and only disclosed pursuant to Evidence Code §§1043 and 1046 or the Evidence Code or other enforceable court process.
6. The Human Resources Department shall work collaboratively with the public safety agencies on responses to complaints filed with external federal or state agencies including, but not limited to, the Department of Fair Employment and Housing, the Equal Employment Opportunity Commission, and the Department of Labor.

This ensures consistent tracking, oversight, and compliance with anti-discrimination and anti-harassment policy.

For the County of Riverside, the cross-reporting requirement in Policy C-25, Section IV(B)(1) is essential for maintaining centralized oversight and legal defense. As the "employer of record," the County, not just individual departments, is held liable for workplace misconduct under California's Fair Employment and Housing Act (FEHA)¹³. The County of Riverside has a duty to prevent and correct harassment. California Government Code §12940(k)¹⁴ mandates that employers take "all

¹³ [California Legislative Government law codes](#)
accessed March 16, 2026

¹⁴ [CA Gov Code 12940](#)
accessed March 16, 2026.

reasonable steps” to prevent and correct harassment. Cross-reporting to HR provides the documentary evidence that the County is actively monitoring and addressing complaints and meeting its legal duty. HR oversight ensures that disciplinary actions for C-25 violations are “administered consistently and equitably throughout the County,” preventing disparate treatment between different agencies.

Cross-reporting ensures an objective, third-party record exists outside the department's internal chain of command, reducing the risk of “self-policing” bias in high-stakes legal environments. Therefore, it is extremely important that HR is made aware of all C-25s the County receives no matter which department it comes from. Centralized reporting is a cornerstone of the County’s risk management strategy. Systemic failures create “risk silos” that jeopardize the county’s insurability and can result in multi-million-dollar liabilities funded by Riverside County residents. Regardless of their elected status, all department heads are legally bound by the California Constitution, Article XI, §1(b).

The three public safety agencies, while at different levels of compliance with C-25 policy, carry the bulk of the dollar amount of paid lawsuits for C-25 complaints by the county¹⁵. All other County departments combined (forty-one departments), between 2016 and 2025 have paid about \$10,000,000 in settlements from C-25 complaints. However, the three public safety agencies have settled claims totaling approximately \$18,000,000. The Probation Department has settled claims totaling \$191,234, the District Attorney’s Office has \$1,552,354, and the Sheriff’s Department has \$16,343,578 in settled claims. From 2020-2025, harassment/discrimination claims were 11% of all general liability costs for the County of Riverside.

The Riverside County Probation Department:

In response to the Grand Jury’s inquiries regarding harassment and discrimination complaints received by the Riverside County Probation Department from 2022 through 2025, the department provided answers and supporting documentation for review. The department submitted its internal Policy 312 on Discriminatory Harassment¹⁶ which has Policy C-25 embedded as the governing framework for handling such complaints, including procedures applicable to public safety personnel under the Peace Officer Bill of Rights.

The Probation Department reported receiving twenty-four complaints during the period in question. Of the twenty-four complaints, nineteen were cross-reported to the Riverside County Human Resources Employee Relations Division (HR/ER). A review revealed that five complaints—four from 2023 and one from 2024—were investigated internally but not reflected in HR/ER’s records. While the internal investigations were conducted appropriately according to Policies 312 and C-25, the lack of formal notification to HR/ER represents a procedural gap, as County policy expects all complaints to be documented and tracked by HR to ensure transparency and oversight.

¹⁵ Rivco HR Claim Frequency and Indemnity Paid Summary (2026) accessed March 16, 2026

¹⁶ [https://www.documentcloud.org/documents/25528841-release_20240807_t151120_riverside-county-probation-department-policy-manualpdf/?q=315&mode=document#document/p2_20240807_T151120_Riverside County Probation Department Policy Manual.pdf](https://www.documentcloud.org/documents/25528841-release_20240807_t151120_riverside-county-probation-department-policy-manualpdf/?q=315&mode=document#document/p2_20240807_T151120_Riverside%20County%20Probation%20Department%20Policy%20Manual.pdf) | DocumentCloud-accessed March 16, 2026

The Department also indicated that it does not maintain a formal record of the number of written complaints or dispositions sent to HR/ER. At the time of this report, internal investigations found no Policy C-25 violations; however, it is noted that two cases remain active and five dispositions from 2023 and 2024 were not formally recorded with HR/ER. The internal handling of these cases aligns with departmental and County policy, but the absence of formal reporting results in incomplete documentation. These gaps highlight an area where procedural compliance could be strengthened through more robust recordkeeping and formal cross-reporting.

To the department's credit, it acknowledged the gaps in procedures and documentation and has already taken steps to align with the Policy C-25 process. With this corrective action, the Probation Department's investigative practices adhere to Policy 312 and C-25, effectively protecting employees and complying with public safety procedural safeguards. The primary area for improvement is the formal documentation and reporting of all complaints and dispositions to HR/ER, specifically those not meeting full C-25 criteria. Enhancing this process would ensure full alignment with County policy, increase transparency, and reinforce the integrity of the County's harassment and discrimination complaint system.

In summary, the Probation Department is actively taking steps to comply with Policy C-25.

The Riverside County Sheriff's Department:

When the Grand Jury requested C-25 data from the Sheriff's Department, it responded with data showing forty-one C-25 complaints filed between 2022 and 2025. None of these forty-one complaints were cross-reported, nor were the dispositions reported to County HR. They stated they respond to complaints in accordance with internal Sheriff Department Policy 328¹⁷, which states:

"Relevant policies, procedures, and definitions related to the Sheriff's Office prevention of, and response to, discrimination, harassment, and workplace violence are codified in Riverside County Board policies. All Sheriff's Office members shall be familiar with the contents of Riverside County Board Policies C-25 and C-27."

While the Sheriff's Department policy reflects alignment with Policy C-25, the practice is not reflective of compliance. The Sheriff's Department affirmed knowledge of Policy C-25 and confirmed the expectation of compliance by the department to cross-report and disclose dispositions of complaints. However, it was also stated that the Sheriff's Department has an instilled culture of operation when it comes to C-25 policy that does not reflect alignment with Policy C-25. It is worth noting that concerns with compliance were previously expressed in the 2009 to 2010 Grand Jury

¹⁷ RELEASE_202 [https://www.riversidesheriff.org/DocumentCenter/View/7912/Standards-Manual-322660219_T174711_Riverside County Sheriff's Department Standards Manual \(DSM\)_202603021437478433.pdf](https://www.riversidesheriff.org/DocumentCenter/View/7912/Standards-Manual-322660219_T174711_Riverside%20County%20Sheriff's%20Department%20Standards%20Manual%20(DSM)_202603021437478433.pdf) accessed March 16, 2026

report titled, “*Riverside County Sheriff’s Department General Orders Policy and Procedures*”¹⁸ which recommended compliance with the C-25 procedure. It was affirmed by Sheriff’s Department employees that the culture has a long-standing mode of operation, and unless directed otherwise or corrected by the administration of the Sheriff’s Department, no corrective action will be taken. This stance violates the Department’s Memorandum of Understanding (MOU) with the County, specifically Article XII, Section 2 (see Appendix C).¹⁹

Policy C-25 regarding Public Safety Agencies also directs the departments to comply with the Peace Officers Bill of Rights (POBR) and California Government Code §3303, which is ensured by cross-reporting complaints to County HR.

By the Sheriff’s Department’s own statements, a recent investigation into a public safety officer included interviews that were conducted after normal working hours, in secret, and without anyone outside the investigative team being aware that an investigation was taking place. This was further stated that the interviews were filed in an “off-the-books administrative review” folder that was not linked to the officer in question and intentionally avoided notifying the officer, citing Government Code §3303 requirements regarding focus officer notification.

The Sheriff’s Department did not inform the County Human Resources Department of the C-25 complaints that initiated the investigation. By excluding notification to County HR of this, and other stated “administrative reviews”, the department increases the risk of non-compliance with internal policy and county policy and reduces accountability and transparency in the handling of complaints.

A member of the Sheriff’s department’s investigative team stated that, within a career spanning many years of investigating C-25s, this individual has never seen a valid C-25 complaint. This brings concern for the discretion for review that is being applied to complaints and legal claims of harassment, discrimination, and retaliation lodged against the department. To align with both State and Federal statutes and policies, County HR must be involved to ensure procedural integrity, transparency, and the protection of the officers whose duties involve protecting the county and its residents.

In summary, the Sheriff’s Department is not compliant with county-wide reporting obligations as outlined in Policy C-25.

The Riverside County District Attorney’s Office:

Between 2022 and 2025, the Riverside County District Attorney’s Office (DA’s Office), reported receiving fourteen harassment and discrimination complaints from employees. The DA’s Office also provided a copy of its internal Administrative Investigation and Disciplinary Action Protocol, which

¹⁸ 10rsogenpol_ https://rivco.gov/sites/g/files/aldnop116/files/Past%20Reports%20%26%20Responses/2009-2010/10rsogenpol_proc.pdf accessed March 16,2026

¹⁹ RSA-LEU MOU 2024–2027
March 16,2026

details the procedures for handling employee complaints, including harassment and discrimination. This internal protocol aligns with and references Policy C-25 by documenting how complaints are received, investigated, and adjudicated within a public safety agency.

However, the DA's Office reported that it has no records responsive to requests regarding cross-reporting these complaints to the Riverside County Human Resources Employee Relations Division, copies of written complaints sent to HR/ER, or dispositions of investigations sent to HR. It was stated that they use a third-party vendor to handle complaints when the DA is conflicted out but also disclosed that the third-party was a former member of the department, which raises questions about the ability of the third-party investigator to remain impartial.

While the DA's Office's policy reflects alignment with Policy C-25, the practice is not reflective of compliance. The DA's Office affirmed knowledge of Policy C-25 and confirmed the expectation of compliance by the department to cross-report and disclose dispositions of complaints. However, it was also stated that the DA's Office has an instilled culture of operation when it comes to Policy C-25 that does not reflect alignment with Policy C-25. It was affirmed that the culture has a long-standing mode of operation and refuses to take corrective action unless directed by the District Attorney. This stance violates the Department's Memorandum of Understanding (MOU) with the County, specifically Article X, Section 2 and Article XIX (see Appendix D).²⁰

In summary, the District Attorney's Office is not in compliance with county wide reporting obligations as outlined in Policy C-25.

CONCLUSION

The Riverside County Civil Grand Jury's investigation revealed that while County of Riverside has established a comprehensive policy framework intended to protect employees from discrimination, harassment, and retaliation, the effectiveness of that framework depends entirely on consistent implementation. However, the practices identified during this investigation demonstrate that the policy is not being applied consistently.

Within the County's Human Resources Department's Employee Relations Division, the routine dismissal of complaints through the unofficially adopted "80/20 rule," inconsistent investigative practices, and limited formal training have weakened the investigative process outlined in Policy C-25. When complaints are declined without sufficient inquiry or when required investigative steps are not consistently followed, the protections promised by the policy cannot function as designed. This practice limits the County's ability to identify patterns of misconduct and contributes to a growing perception among employees that reporting concerns may be ineffective.

²⁰ [DDAA MOU 2023–2027](#)
[%20Clean.pdfchment A - 2023 - 2027 DDAA MOU - Clean.pdf-accessed March 16,2026](#)

The lack of consistent investigative standards, insufficient oversight of public safety agency compliance, and the routine dismissal of complaints without adequate inquiry undermine the policy's intent and contribute to employee perceptions that reporting discrimination or harassment is ineffective. These findings underscore the need for immediate corrective action to ensure C-25 complaints are handled in a manner that is fair, thorough, and consistent with County policy.

The Grand Jury also identified significant compliance issues within certain public safety agencies. While county policy allows these agencies to conduct internal investigations in accordance with the Peace Officer Bill of Rights, the required coordination and reporting to County Human Resources has not been followed and, at times, refused. As the County remains the employer of record and ultimately bears responsibility under state and federal law, these gaps in reporting and oversight increase both organizational and legal risk.

A policy designed to protect employees is only effective when it is applied consistently, transparently, and in accordance with its written requirements. Strengthening investigative procedures, ensuring comprehensive training, and reinforcing county wide reporting and oversight will restore the integrity of the Policy C-25 process and reaffirm the County's commitment to maintaining a workplace that is safe, respectful, and accountable.

FINDINGS

- F1. HR is failing to thoroughly and impartially investigate C-25 complaints.
- F2. HR has unofficially adopted a practice termed the “80/20 Rule” to screen C-25 complaints contrary to terms of Policy C-25.
- F3. Public safety agencies are not following Policy C-25 requirements to cross reporting and/or forward C-25 complaints to HR.
- F4. Public safety agencies are not following the Policy C-25 requirement to report disciplinary action related to C-25 complaints to HR.
- F5. HR is failing to take action to ensure compliance with Policy C-25 by the public safety agencies.

RECOMMENDATIONS

- R1. The Riverside County Civil Grand Jury recommends that HR eliminates the practice in HR surrounding the unofficial “80/20 Rule”. The County should direct the Human Resources Department to immediately discontinue this practice or any similar screening practice that results in complaints being dismissed without investigation. Policy C-25 should be enforced as written.
Based on Finding: F-1 and F-2
Financial Impact: None
- R2. The Riverside County Civil Grand Jury recommends that HR implements formal training for HR investigators. The program should include, but not be limited to, instruction on Policy C-25, investigative procedures, and effective interview techniques within six months from receipt of this report.
Based on Finding: F-1, F-2, F-3, F-4, F-5
Financial Impact: Minimal
- R3. The Riverside County Civil Grand Jury recommends that HR and the Executive Office should conduct a comprehensive audit to verify public safety agencies’ compliance with Policy C-25. The audit should examine compliance with reporting, updating historical records, the dispositions of discipline and any “off-the-books Administrative Reviews” within three months from receipt of this report.
Based on Finding: F-3, F-4, F-5
Financial Impact: Minimal

REQUEST FOR RESPONSES

According to California Penal Code §933, governing bodies must respond to grand jury findings and recommendations within ninety days while an elected county officer must respond to grand jury findings and recommendations within sixty days. California Penal Code §933.05 specifies how responses should be structured.

REQUIRED RESPONSES

Who	Findings	Recommendations
Riverside County Board of Supervisors	F1 – F5	R1 – R3
Riverside County Human Resources	F1 – F5	R1 – R3
Riverside County District Attorney’s Office	F-3, F-4, F-5	R3
Riverside County Sheriff’s Department	F-3, F-4, F-5	R3
Riverside County Probation Department	F-3, F-4, F-5	R3
County of Riverside Executive Office	F1 – F5	R3

Reports issued by the Grand Jury do not identify individuals interviewed. Penal Code section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Grand Jury.

Appendix

Appendix A

COUNTY OF RIVERSIDE, CALIFORNIA BOARD OF SUPERVISORS POLICY C-25

Policy Subject: NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY C-25 AND COMPLAINT PROCEDURE COMPLAINT INVESTIGATION

Upon receiving notification of a discrimination/harassment complaint, the Department Head, the Human Resources Director or designee, shall:

1. Immediately authorize and supervise the investigation of the complaint. The investigation shall, at a minimum, include interviews with the complainant, the accused harasser, and any other persons the Department Head or the Human Resources Director has reason to believe may have relevant knowledge concerning the complaint.
2. Review the factual information gathered through the investigation to determine whether the alleged conduct constitutes discrimination and/or harassment giving consideration to all actual information and the totality of the circumstance, including the nature of the visual, verbal, and/or physical conduct.
3. Take or recommend prompt and effective remedial action against the harasser if it is determined through the investigation that illegal discrimination and/or harassment occurred.
4. Take reasonable steps to protect the complainant from further discrimination and/or harassment and any retaliation.
5. Take action to remedy the victim's loss, if any, which resulted from the harassment.

COMPLAINT Procedure for Public Safety Agencies:

Public safety agencies (Riverside County Sheriff's Department, District Attorney's Office, and Probation Department) are charged with conducting investigations of allegations of violation of this policy. These departments shall comply with the Peace Officer Bill of Rights (POBR), California Government Code Sections 3300-3313, for peace officers employed in their departments.

In order to ensure consistency countywide the public safety agencies shall:

3. Upon receipt of verbal notification of a C-25 complaint, the public safety agency shall cross-report in writing the name of the complainant(s), name of the accused, allegation(s), and a brief summary of which the complaint is based to the Human Resources Employee Relations Division. The public safety agency will provide a copy of any written complaint received to the Human Resources Employee Relations Division.
4. The public safety agency will conduct the investigation pursuant to the requirements set forth in POBR §3303, for peace officers employed in their departments.

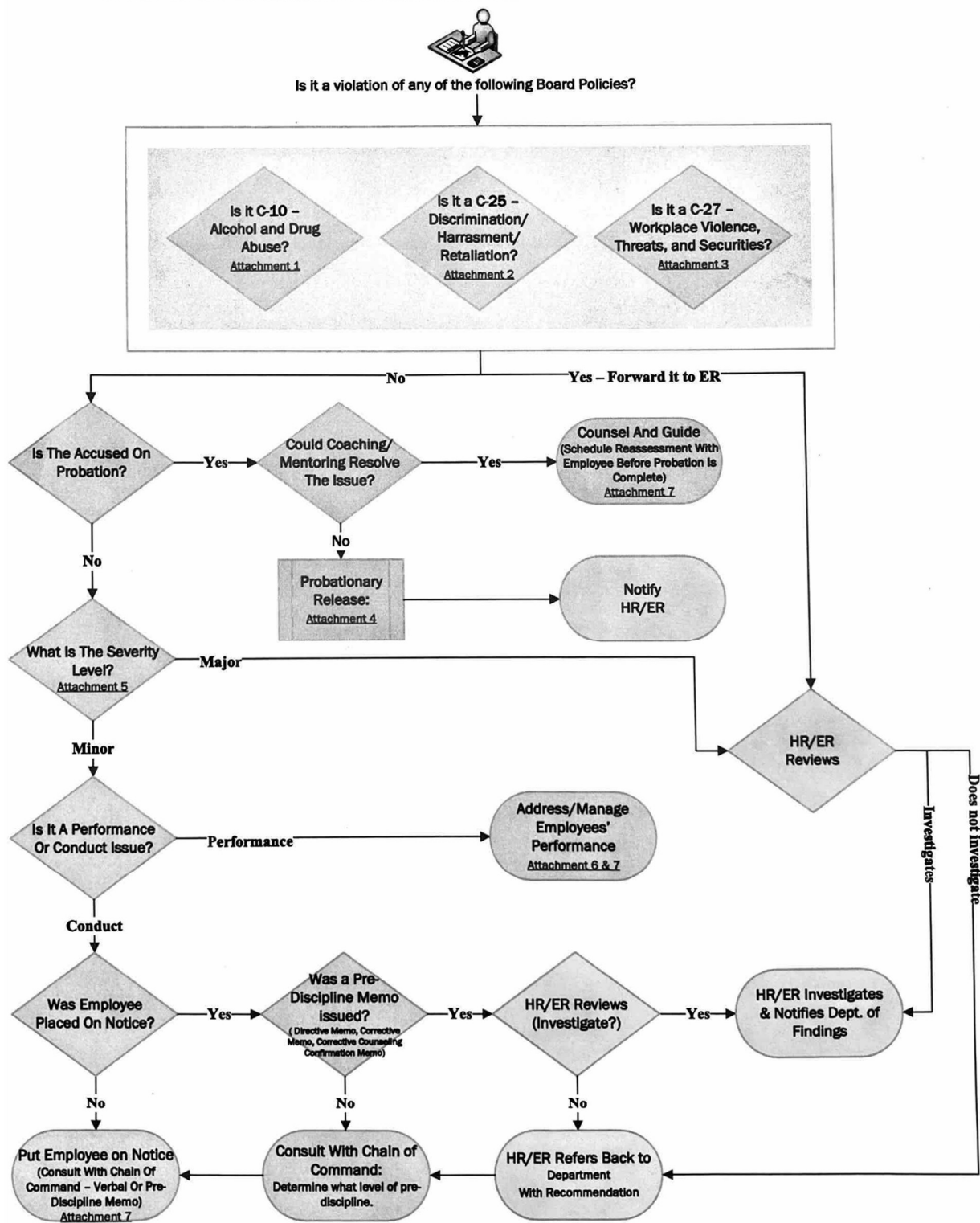
7. At the conclusion of the investigation, the public safety agency shall provide the Human Resources Employee Relations Division with the complaint disposition (i.e. sustained, not-sustained, or unfounded) within 30 working days of the conclusion of the investigation.
8. For investigations conducted by the Sheriff's Department or District Attorney's Office against an employee within their respective chains of command, any disciplinary action taken shall be at the discretion of the Department Head. However, the level of discipline must be consistent with countywide disciplinary actions taken with similar acts or omissions related to this policy.
9. Pursuant to Penal Code Section 832.7, the completed investigation shall be maintained by the public safety agency and only disclosed pursuant to Sections 1043 and 1046 of the Evidence Code or other enforceable court process.
10. The Human Resources Department shall work collaboratively with the public safety agencies on responses to complaints filed with external federal or state agencies including, but not limited to, the Department of Fair Employment and Housing, the Equal Employment Opportunity Commission, and the Department of Labor.

Appendix B

Disciplinary Process Guide

Consult with ER as needed throughout the process

RIVCO HR
employee relations



Note to supervisors: During the ER review/investigation of reported issue, all unrelated conduct/performance issues with complainant/accused should be addressed independently of the issue being reviewed by ER. If a new issue arises that is related to the issue under review/investigation, consult with the assigned investigator for guidance.

Legend

Department Actions

County Human Resources,
Employee Relations (HR/ER)

Appendix C

ARTICLE XII GRIEVANCE PROCEDURE

Section 2. GRIEVANCE DEFINITION

Except as outlined below, A "grievance" is a dispute - the solution of which is wholly or partially within the province of the County to rectify - that involves the interpretation or application of the MOU; or existing (a) Ordinances, (b) rules, (c) regulations, or (d) policies concerning wages, hours, and other terms and conditions of employment. Where a grievance affects more than one

- (1) employee, RSA may file a grievance by identifying the affected employees, either by name or some other method that makes their identity clear.

Appendix D

ARTICLE X DISCIPLINE, DISMISSAL, AND REVIEW

Section 2. Any of the following acts of an employee who has permanent status shall be good cause for dismissal, demotion, reduction in compensation, suspension, or any other action taken for disciplinary reasons:

- a. Dishonesty;
- b. Incompetence;
- c. Inefficiency or negligence in performance of duties;
- d. Neglect of duty;
- e. Insubordination;
- f. Willful violation of an employee regulation prescribed by the Board of Supervisors or the head of the department in which the employee is employed;
- g. Absence without leave;
- h. Conviction of either a felony, or any offense, misdemeanor or felony, involving moral turpitude, or any offense in connection with or affecting the employee's duties other than minor traffic violations. Conviction means a plea of guilty or nolo contendere or a determination of guilt in a court of competent jurisdiction;
- I. Discourteous treatment of the public or other employees;
- j. Political activity in violation of federal or state law;
- k. Physical or mental unfitness to perform assigned duties;
- l. Making a material misrepresentation in connection with obtaining or maintaining employment or position;
- m. Conduct either during or outside of duty hours, which adversely affects the employee's job performance or operation of the department in which he/she is employed.

- n. Off-duty conduct that has nexus to the employee's job which may impact the employee's skills or ability to perform the job
- o. Failure to maintain the license, registration, certificate, professional qualifications, education, or eligibility required for the employee's classification when the failure of the employee to maintain such requirements adversely affects the employee's ability to perform his or her job or the performance of the department. The department shall prescribe procedures to insure that employee affected by the requirements are informed of them.
- p. Substance abuse in violation of the Board of Supervisors' Alcohol and Drug Abuse Policy C-10.
- q. Violation of the Board of Supervisors' Workplace Violence, Threats and Securities Policy C-27.
- r. Violation of the Board of Supervisors' Non-Discrimination and Anti-Harassment Policy C-25.
- s. Violation of the Rules of Professional Conduct of the State Bar of California or California State Bar Act.

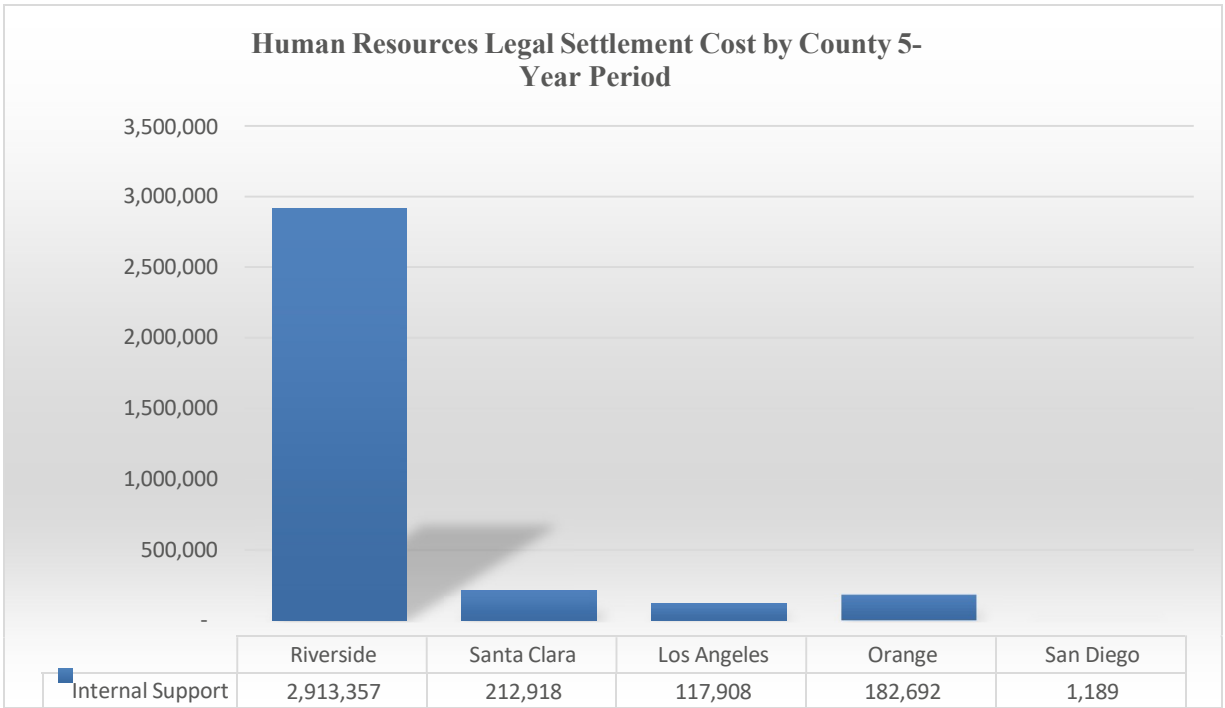
ARTICLE XIX

DISCRIMINATION COMPLAINT PROCEDURE

- (2) The County has established a strong commitment to prohibit and to prevent unlawful harassment and/or discrimination in employment and has set forth a procedure for investigating and resolving internal complaints in Board of Supervisors Policy C-25. Employees are expected to be familiar with and comply with Policy C-25.

Appendix E

Figure 8: Human Resources Portfolio Legal Settlement Cost by County, 5-Year Period



Report Issued Date: 5-18-2026
Report Public Date: 5-21-2026
Response Due Date: 8-21-2026