

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



ITEM: 3.94
(ID # 31218)

MEETING DATE:
Tuesday, August 25, 2026

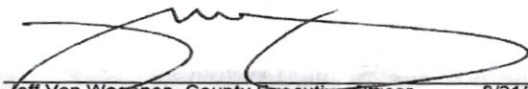
FROM : EXECUTIVE OFFICE

SUBJECT: EXECUTIVE OFFICE: Approval of the Response to the 2025-2026 Grand Jury Report 'Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures'.

RECOMMENDED MOTION: That the Board of Supervisors:

1. Approve, with or without modification, the attached response from the Board of Supervisors, the Executive Office, and Human Resources to the 2025-26 Grand Jury Report: *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures*; and
2. Direct the Clerk of the Board to immediately forward the Board's finalized responses to the Civil Grand Jury, the Presiding Judge of the Superior Court, and the County Clerk-Recorder.
3. Direct the Executive Office and Human Resources to return to the Board with a workload and staffing assessment for the Human Resources Employee Relations Division and recommendations for staffing-level adjustments necessary to support timely, thorough, and well-documented workplace complaint investigations, improve communication with parties and departments, and expand proactive prevention and training efforts.

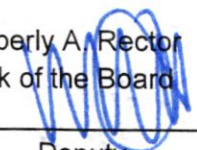
ACTION: Policy


Jeff Van Wageningen, County Executive Officer 8/21/2026

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Washington, seconded by Supervisor Perez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Medina, Spiegel, Washington, Perez, and Gutierrez
Nays: None
Absent: None
Date: August 25, 2026
xc: EO, HR, Civil Grand Jury, Presiding Judge, ACR

Kimberly A. Rector
Clerk of the Board
By: 
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	N/A	N/A	N/A	N/A
NET COUNTY COST	N/A	N/A	N/A	N/A
SOURCE OF FUNDS: N/A			Budget Adjustment: No	
			For Fiscal Year: 26/27	

C.E.O. RECOMMENDATION: Approve.

BACKGROUND:

Summary

On May 21, 2026, the Riverside County Civil Grand Jury released the report titled *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures*. The report reviews the County's implementation of Board Policy C-25, the County's Non-Discrimination and Anti-Harassment Policy and Complaint Procedure, including Human Resources' handling of Policy C-25 complaints and the reporting obligations of public safety agencies.

Policy C-25 is intended to protect employees from unlawful discrimination, harassment, and retaliation and to provide a procedure for promptly investigating and taking appropriate remedial action in response to internal complaints. The report raises concerns regarding employee confidence in the complaint process, Human Resources' intake and investigation practices, and the consistency of public safety agency cross-reporting and disposition reporting to Human Resources.

The attached response reaffirms the Board's commitment to a workplace free from unlawful discrimination, harassment, and retaliation, and to complaint procedures that are prompt, fair, thorough, and consistent. The response also explains that the County disagrees with certain broad conclusions in the report, including the finding that Human Resources fails to thoroughly or impartially investigate Policy C-25 complaints and the finding that Human Resources has adopted an "80/20 Rule" or similar numerical screening practice.

At the same time, the response recognizes the need to strengthen clarity, documentation, training, and countywide consistency. The response explains that Human Resources must distinguish between a complaint that is labeled or submitted as a Policy C-25 complaint and a complaint that alleges facts which, if true, fall within the scope of Policy C-25. Not every workplace dispute, interpersonal conflict, discourteous interaction, management disagreement, or general misconduct allegation is a Policy C-25 matter. However, concerns that do not fall within Policy C-25 are not ignored and may be addressed through other appropriate County or departmental processes.

With respect to the alleged "80/20 Rule," the response states that Human Resources does not use or rely upon any numerical or outcome-based screening practice for Policy C-25

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA

complaints. Because there is no such practice to discontinue, the recommendation is not implemented as framed. Separately, Human Resources will reinforce in written guidance and investigator training that all Policy C-25 intake and scope determinations must be individualized and based on the allegations presented, Policy C-25, and applicable law.

The attached response also acknowledges that cross-reporting, forwarding, disposition reporting, and related documentation by covered public safety agencies have not been applied consistently. The response recognizes the need to strengthen compliance expectations while preserving legally protected investigative, prosecutorial, personnel-record, and peace officer procedural requirements. The County's focus is to improve reliable cross-reporting, tracking, disposition reporting, and administrative coordination without re-investigating individual personnel matters or requiring disclosure of confidential records except as permitted by law.

Finally, the response recognizes that timeliness is an important component of employee confidence in the complaint process. Before issuance of the report, the Executive Office and Human Resources had begun evaluating Policy C-25 workload, HR/ER operational capacity, and investigation cycle times. Additional dedicated investigative capacity may improve timeliness, follow-up communication, documentation, and proactive prevention efforts, and any future staffing needs will be evaluated through the County's normal budget process.

ATTACHMENTS:

Attachment A. 2025-2026 Civil Grand Jury Report: *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures*

Attachment B. Board of Supervisors, Executive Office, and Human Resources Response to the 2025-2026 Civil Grand Jury Report: *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures*

Attachment C. District Attorney's Office Response to the 2025-2026 Civil Grand Jury Report: *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures* (Informational Copy)

Attachment D. Sheriff's Office Response to the 2025-2026 Civil Grand Jury Report: *Policy vs. Practice: An Investigation into Riverside County's Workplace Discrimination Procedures* (Informational Copy)


Minh C. Tran, County Counsel 8/21/2026

2025-26 Grand Jury Report
Policy vs. Practice: An Investigation into Riverside County's
Workplace Discrimination Procedures
August 25, 2026
Board of Supervisors, Executive Office, Human Resources

The Board of Supervisors (Board) appreciates the Civil Grand Jury's service and its attention to employee confidence in the County's workplace complaint processes. The Board is committed to a workplace free from unlawful discrimination, harassment, and retaliation and to complaint procedures that are prompt, fair, thorough, and consistent.

These responses were prepared with input from the Executive Office, Human Resources, the Sheriff's Office, the Probation Department and the District Attorney's Office.

The disagreement with certain findings and recommendations does not diminish the Board's appreciation for the opportunities to clarify procedures, strengthen documentation, and improve countywide consistency.

GRAND JURY FINDINGS:

Grand Jury Finding #1:

HR is failing to thoroughly and impartially investigate C-25 complaints.

Response to Grand Jury Finding #1:

Respondent disagrees wholly with finding.

The County respectfully disagrees with the finding to the extent it concludes that Human Resources fails to thoroughly or impartially investigate complaints that fall within Board Policy C-25. Human Resources Employee Relations (HR/ER) investigates Policy C-25 complaints consistent with applicable law and County policies. Policy C-25 protects employees from unlawful discrimination, harassment, and retaliation and establishes a procedure for investigating and taking appropriate remedial action in response to internal complaints of unlawful discrimination, harassment, and retaliation.

The County recognizes that the complaint process should be clearly understood, consistently applied, and sufficiently documented so that employees, departments, and reviewing bodies can distinguish between: (1) a complaint that is labeled or submitted as a Policy C-25 complaint; and (2) a complaint that alleges facts which, if true, would fall within the scope of Policy C-25.

Policy C-25 applies to complaints involving unlawful discrimination, harassment, or retaliation based on a protected class, protected status, or protected activity. Not every workplace dispute, interpersonal conflict, discourteous interaction, management disagreement, or general misconduct allegation falls within Policy C-25. When HR/ER receives a complaint, HR/ER conducts an intake and scope review to determine whether the allegations, if true, would implicate Policy C-25. If the initial complaint is vague, ambiguous, unclear, or lacks sufficient detail for HR/ER to determine whether the alleged conduct is connected to a protected class, protected status, or protected activity, HR/ER will make reasonable efforts, where possible, to contact the complainant to clarify the allegations before making a final scope determination.

When the complaint states, or clarification confirms, allegations within the scope of Policy C-25, HR/ER conducts a Policy C-25 investigation. That investigation includes interviews with the complainant, the accused, and other persons HR/ER has reason to believe may have relevant knowledge concerning the complaint, consistent with Policy C-25. HR/ER findings are documented, reviewed, and subject to supervisory review for neutrality, consistency, and adherence to County policies.

When a complaint does not fall within the scope of Policy C-25, HR/ER does not ignore the concern. Depending on the facts presented, the matter may be referred to or addressed through other appropriate processes, including departmental management review, general misconduct processes, coaching, mediation, training, corrective action, or discipline where warranted. Those alternative processes do not convert the matter into a Policy C-25 investigation if the allegations do not involve unlawful discrimination, harassment, or retaliation under the policy.

Accordingly, the County disagrees that HR is failing to thoroughly or impartially investigate Policy C-25 complaints.

Thorough, impartial, and timely investigations require adequate investigative capacity, consistent documentation, interviews where required, supervisory review, and communication with the parties and affected departments. When the volume and complexity of matters exceed available capacity, investigations and written reports can take longer than employees, accused parties, departments, and HR reasonably expect. Before the Civil Grand Jury issued its report, the Executive Office and HR had already begun evaluating the Policy C-25 workload, the operational capacity of the HR/ER team, and investigation cycle times. HR/ER currently has twenty-six (26) investigators responsible for approximately 400 open employee-relations matters at any given time, in addition to other employee-relations responsibilities, including litigation support, arbitration, external state and federal agency matters, and department consultation. Additional dedicated investigative capacity may help reduce investigation timelines, improve follow-up communication and documentation, and allow HR/ER to devote more time to proactive prevention, training, early intervention, and other strategies designed to reduce complaints and mitigate employee-related challenges.

Grand Jury Finding #2:

HR has unofficially adopted a practice termed the "80/20 Rule" to screen C-25 complaints contrary to terms of Policy C-25.

Response to Grand Jury Finding #2:

Respondent disagrees wholly with finding.

The County respectfully disagrees that HR/ER has adopted an "80/20 Rule" as a policy, procedure, standard, or practice for screening Policy C-25 complaints. HR/ER does not use a numerical or outcome-based formula to determine whether complaints will be investigated. HR/ER does not predetermine that any percentage of complaints will or will not proceed to a Policy C-25 investigation. Each complaint is reviewed based on the specific allegations presented and whether those allegations, if true, fall within the scope of Policy C-25.

Grand Jury Finding #3:

Public safety agencies are not following Policy C-25 requirements to cross-reporting [SIC] and/or forward C-25 complaints to HR.

Response to Grand Jury Finding #3:

Respondent disagrees partially with the finding.

For purposes of Policy C-25's public safety complaint procedure, the covered agencies are the Sheriff's Office, the District Attorney's Office, and the Probation Department. Policy C-25 permits those departments to conduct their own investigations, subject to applicable peace-officer procedural requirements, but separately requires written cross-reporting to HR upon receipt of a verbal Policy C-25 complaint and transmittal of any written complaint.

The County agrees that cross-reporting and related documentation were not applied consistently across the covered public safety departments during the period reviewed. The County further agrees that consistent cross-reporting is important to countywide tracking, policy compliance, employee confidence, and risk management.

The County disagrees to the extent the finding may be read to mean that every complaint, regardless of subject matter, must be cross-reported as a Policy C-25 complaint. The cross-reporting obligation applies when a complaint alleges facts that, if true, would implicate Policy C-25, including unlawful discrimination, harassment, or retaliation based on a protected class, protected status, or protected activity. Complaints involving general discourtesy, interpersonal conflict, performance management, or other workplace conduct may require attention, correction, or discipline, but do not necessarily constitute Policy C-25 complaints.

Grand Jury Finding #4:

Public safety agencies are not following the Policy C-25 requirements to report disciplinary action related to C-25 complaints to HR.

Response to Grand Jury Finding #4:

Respondent disagrees partially with the finding.

The County agrees that reporting and documentation of Policy C-25 complaint dispositions and related outcomes have not been applied consistently by all covered public safety agencies. Policy C-25 requires public safety agencies, at the conclusion of an investigation, to provide HR/ER with the complaint disposition, such as sustained, not sustained, or unfounded, within 30 working days of the conclusion of the investigation. The policy also provides that, for investigations conducted by the Sheriff's Office or District Attorney's Office against employees within their respective chains of command, any disciplinary action taken is at the discretion of the Department Head, but the level of discipline must be consistent with countywide disciplinary actions taken with similar acts or omissions related to the policy.

The County disagrees to the extent the finding may be read to require wholesale disclosure of completed peace officer personnel investigations or confidential personnel records to HR/ER beyond what is authorized by law and Policy C-25. Policy C-25 recognizes that completed public safety investigations are maintained by the public safety agency and disclosed only pursuant to applicable law, including Penal Code section 832.7, Evidence Code sections 1043 and 1046, or other enforceable court processes.

The County's corrective focus is to ensure that HR/ER receives timely complaint dispositions and, for sustained Policy C-25 findings, sufficient discipline-related outcome information to evaluate countywide consistency, support external agency responses where necessary, and preserve confidentiality and statutory protections applicable to public safety personnel records.

Grand Jury Finding #5:

HR is failing to take action to ensure compliance with Policy C-25 by the public safety agencies.

Response to Grand Jury Finding #5:

Respondent disagrees partially with the finding.

The County respectfully disagrees that HR has failed to take action to ensure compliance with Policy C-25 by public safety agencies. HR/ER provides guidance, consultation, coordination, and tracking support for Policy C-25 matters. HR/ER also works with public safety departments regarding complaint processes, case status, external agency responses, and related personnel issues.

For example, HR/ER meets regularly with the Probation Department's Professional Standards Bureau to review open complaints and investigation status, and HR/ER tracks and documents case notes for verification. HR/ER also coordinates with departments when complaints are submitted directly to HR and then forwarded to the appropriate department for handling consistent with Policy C-25 and applicable law.

The County agrees, however, that compliance expectations for public safety cross-reporting, disposition reporting, and historical documentation should be strengthened. HR does not have authority to direct the Sheriff's or District Attorney's core law-enforcement investigative or prosecutorial functions, and the County may not obstruct those functions. At the same time, Policy C-25 is a countywide employment policy designed to ensure compliance with anti-discrimination, anti-harassment, and anti-retaliation requirements. Public safety agencies remain subject to the policy's reporting and coordination requirements to the extent those requirements do not interfere with legally protected investigative or prosecutorial functions.

Accordingly, the County disagrees with the conclusion that HR has failed to act, but agrees that additional documentation, clearer cross-reporting expectations, and a structured compliance review are appropriate to strengthen consistency going forward.

GRAND JURY RECOMMENDATIONS:

Grand Jury Recommendation #1:

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 practices that result in complaints being dismissed without investigation. Policy C-25 should be enforced as written.

Response to Grand Jury Recommendation #1:

Recommendation will not be implemented because it is not warranted or reasonable.

HR/ER does not utilize or rely upon an "80/20 Rule," and HR/ER has not adopted any numerical or outcome-based screening practice for Policy C-25 complaints. Accordingly, there is no such practice to discontinue.

The County agrees that additional written guidance and documentation of intake and scope determinations, coupled with reduced caseloads and more timely investigations, may help avoid confusion and improve employee confidence in the process. HR/ER is committed to continuous evaluation and refinement of its intake operations to ensure the highest standards of clarity, fairness, and timeliness. Separately, HR/ER will reinforce in written guidance and investigator training that no "80/20 Rule," numerical formula, or similar shorthand may be used or referenced in evaluating complaints. Every complaint

submitted under Policy C-25 will continue to receive an individualized intake and scope review based on the allegations presented, Policy C-25, and applicable law. Every complaint under Policy C-25 will continue to receive an individualized review governed strictly by the policy's scope, applicable law, and presented facts.

Policy C-25 will continue to be enforced as written. Complaints that fall within the scope of Policy C-25 will proceed through the policy's investigation process. Complaints that do not fall within Policy C-25 will be addressed, as appropriate, through other applicable County or departmental processes.

Grand Jury Recommendation #2:

The Riverside County Civil Grand Jury recommends that HR implements formal training for HR investigators. The program should include, but not limited to, instruction on Policy C-25, investigative procedures, and effective interview techniques within six months from receipt of this report.

Response to Grand Jury Recommendation #2:

Recommendation has not been implemented, but will be implemented. The implementation time frame is noted in the response.

HR/ER currently provides training and development opportunities for investigators, including in-house instruction, webinars, mentoring, supervisory review, quality-control processes, and investigator training provided by outside legal counsel. HR/ER has also strengthened onboarding and mentoring practices so that less experienced investigators work with more experienced investigators and investigative work is reviewed for accuracy, consistency, and compliance with County policy.

The County agrees that strengthening investigator training specific to Policy C-25 will improve consistency and employee confidence in the process. Within six months of receipt of the report, HR/ER will update the core formal Policy C-25 investigator training framework. The framework will include instruction on Policy C-25, intake and scope determinations, protected-class and protected-activity analysis, investigative planning, interview techniques, documentation, neutrality, findings, remedial recommendations, retaliation prevention, and coordination with departments.

The County also recognizes that training alone will not address every concern related to timeliness or employee confidence. HR/ER's ability to complete timely interviews, written reports, communications, and follow-up is affected by the volume and complexity of matters assigned to investigators. The Executive Office and HR will continue evaluating HR/ER workload, investigation cycle times, and operational capacity. Any recommended staffing adjustments will be returned to the Board through the County's regular budget and Board approval process.

Grand Jury Recommendation #3:

The Riverside 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 disposition of discipline and any "off-the-books Administrative Reviews" within three months from receipt of this report.

Response to Grand Jury Recommendation #3:

Recommendation has not been implemented, but will be implemented. The implementation time frame is noted in the response.

The County agrees that a structured review of public safety Policy C-25 cross-reporting and disposition-reporting practices is appropriate. The County does not agree that the review should be framed as a re-investigation of individual personnel matters or as an unrestricted audit of confidential peace officer personnel records. Policy C-25 expressly recognizes that completed public safety investigations are maintained by the public safety agency and disclosed only as permitted by law. The review will focus on prospective cross-reporting, forwarding of written complaints, disposition reporting, legally appropriate documentation of sustained Policy C-25 outcomes, historical reconciliation to the extent permitted by law, and a prospective tracking process.

The Executive Office and HR/ER will complete an initial compliance review of prospective public safety department Policy C-25 reporting processes within six months. Historical reconciliation of Policy C-25 complaint and disposition records, to the extent permitted by law, will be completed within twelve months of receipt of the report.

Department comments:

The Riverside County Sheriff's Office respectfully disagrees with this finding. The finding reaches a conclusion regarding the actions and responsibilities of County Human Resources that is not supported by information available to the Department and does not accurately reflect the collaborative processes that exist between County Human Resources and County departments.

County Human Resources has established policies, procedures, and reporting mechanisms designed to promote compliance with Board of Supervisors Policy C-25. The Sheriff's Office regularly works in coordination with County Human Resources regarding matters that implicate Policy C-25 and has found Human Resources to be responsive and engaged in fulfilling its oversight and advisory responsibilities under County policy.

Policy C-25 establishes a framework that assigns responsibilities to both County departments and County Human Resources. Compliance with the policy is a shared responsibility that includes complaint reporting, investigation, consultation, documentation, training, and corrective action when warranted. The Sheriff's Office is not aware of any systemic failure by County Human Resources to carry out its responsibilities under the policy, nor has the Department identified evidence demonstrating that Human Resources has failed to take appropriate action to promote compliance by public safety agencies.

Furthermore, the finding appears to presume that the existence of complaints or disciplinary actions necessarily demonstrates a failure of oversight by Human Resources. Such a conclusion overlooks the fact that complaints are investigated, allegations are evaluated based upon the evidence, and corrective action is taken when warranted. The existence of workplace complaints does not, by itself, establish noncompliance with Policy C-25 or a failure by Human Resources to perform its duties.

The Sheriff's Office remains committed to working collaboratively with County Human Resources to ensure compliance with Policy C-25, to provide a workplace free from discrimination, harassment, and retaliation, and to hold employees accountable when misconduct is identified. Based upon the Department's experience and interactions with County Human Resources, the Department disagrees with the finding that Human Resources is failing to take action to ensure compliance with Policy C-25 by public safety agencies.

GRAND JURY RECOMMENDATIONS:

Grand Jury Recommendation #3:

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

disposition of discipline and any "off-the-books Administrative Reviews" within three months from receipt of this report.

Response to Grand Jury #3:

Recommendation will not be implemented because it is not warranted or reasonable.

Department comments:

The Riverside County Sheriff's Office respectfully disagrees that an audit of this issue is a reasonable or necessary course of action. The recommendation for an audit appears to be based on assumptions of systemic noncompliance that are not supported by the Department's operational experience or by evidence demonstrating a widespread failure to comply with County policy. However, should the Executive Office determine that an audit is warranted or request the Sheriff's Office participate in such an audit, the Sheriff's Office will fully cooperate and provide any information, documentation, or assistance reasonably requested in support of that review.

The Sheriff's Office believes an audit cannot be framed as a reinvestigation of individual personnel matters or as an unrestricted audit of confidential peace officer personnel records. Policy C-25 expressly recognizes completed public safety investigations are maintained by the public safety agency and disclosed only as permitted by law.

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Department comments: The District Attorney's Office will communicate any formal disciplinary action stemming from a C-25 filing to County Human Resources going forward.

Grand Jury Finding #3:

F5. HR is failing to take action to ensure compliance with Policy C-25 by the public agencies.

Response to Grand Jury Finding #3:

Respondent agrees with finding.

Department comments: The District Attorney's Office will cross reference C-25 complaints and outcomes going forward.

GRAND JURY RECOMMENDATIONS:

Grand Jury Recommendation #1:

Response to Grand Jury #1: *Not applicable to our Department.*

Grand Jury Recommendation #2:

Click or tap here to enter text.

Response to Grand Jury #2: *Not applicable to our Department.*

Choose an item.

Department comments:

Grand Jury Recommendation #3: 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 and any "off-the-books Administrative Reviews" within three months from receipt of this report.

Response to Grand Jury #3:

Recommendation will not be implemented because it is not warranted or reasonable.