



City of Arts & Innovation

Governmental Processes Committee Memorandum

**TO: GOVERNMENTAL PROCESSES
COMMITTEE**

DATE: NOVEMBER 5, 2025

FROM: BOARD OF ETHICS

WARDS: ALL

SUBJECT: CODE OF ETHICS AND CONDUCT ANNUAL REVIEW

ISSUE:

Perform the annual review of the Code of Ethics and Conduct for its effectiveness and consider any revisions for recommendation for City Council consideration.

RECOMMENDATIONS:

That the Governmental Processes Committee perform the annual review of the Code of Ethics and Conduct for its effectiveness, consider any recommendations for revisions from the Board of Ethics, and submit its recommendations to the City Council as required by Section 2.78.110 of the Riverside Municipal Code.

LEGISLATIVE HISTORY/BACKGROUND:

Charter Section 202 requires the adoption of a Code of Ethics and Conduct for elected officials and members of appointed boards, commissions, and committees to assure public confidence in the integrity of local government and its effective and fair operation. The first Code of Ethics and Conduct, adopted by a Resolution of the City Council on July 1, 2005, was amended several times.

On April 5, 2016, Ordinance No. 7328 was adopted adding Chapters 2.78 and 2.80 to the Riverside Municipal Code, adopting a revised Code of Ethics and Conduct, and establishing the Board of Ethics (BOE).

RMC Section 2.78.110 provides for annual monitoring and oversight in the following cadence:

- Before the end of July of each year, all boards and commissions shall review and discuss the Code of Ethics and Conduct and submit recommendations, if any, to the BOE for their consideration.

- Then before the end of August, the BOE shall review and discuss the effectiveness of the Code of Ethics and Conduct and the recommendations of the other boards and commissions, then submit their recommendations to the Governmental Processes Committee (GPC).
- Subsequently, in September, the GPC will review and discuss the effectiveness of this Code of Ethics and Conduct, in addition to the recommendations from the Boards and Commissions, then instruct the City Manager to present a report to the City Council for their consideration.
- Then lastly, prior to the end of each year, the Chair of the GPC will present a report to the City Council, which shall include the recommendations from the Boards and Commissions and GPC. At which time, the City Council conducts a public hearing to review the report and make an independent evaluation of the effectiveness of this chapter. After their discussion, City Council may direct the City Attorney to make any necessary changes to this chapter it deems appropriate.

DISCUSSION:

On June 2, 2025, the Human Resources Board submitted three recommendations: (a) drafting a section for digital conduct; (b) clarifying explicit protection for whistleblowers; and (c) expanding the complaint eligibility to vendors/contractors and guests that directly interface with the public officials.

On June 25, 2025, the Community Police Review Commission recommended that the six months to a year timeline to file an ethics complaint be explored for appropriateness.

On July 10, 2025, the Budget Engagement Commission recommended providing guidance to City staff for filing complaints and creating whistleblower protocols.

The Airport Commission, Commission on Aging, Commission on Disabilities, Cultural Heritage Board, Human Relations Commission, Board of Library Trustees, Museum Board of Riverside, Park and Recreation Commission, Planning Commission, Board of Public Utilities, and Transportation Board submitted no recommendations for amendments for the BOE consideration.

On August 7, 2025, the BOE conducted its annual review of the Code of Ethics and considered those recommendations received from the boards and commissions noted above. The BOE recommended the GPC consider the following revisions to the COE, also outlined in Exhibit A:

1. Under "RMC 2.78.040.F, insert "including vendors and contractors" after work to read:
 - F. Only those who live, work (including vendors and contractors), or attend school in Riverside may bring a complaint, unless the alleged violation took place outside of the boundaries of the City of Riverside and the complaining party must have personally witnessed or observed the alleged violation.
2. Under "RMC 2.78.050 - Core Values", add "I" regarding digital communications to read:
 - I. Digital communication must reflect the City's commitment to impartiality, fairness, and integrity. Online activity, messages or actions should not create, or appear to create, bias, partisanship, a conflict of interest, or predisposition on pending City matters.

3. Under "RMC 2.78.060 - Prohibited conduct", add "O" regarding digital misconduct prohibited to read:
 - O. Digital misconduct prohibited. Those subject to this code are prohibited from engaging in digital misconduct. Online activity or messages that create, or appear to create, bias, partisanship, a conflict of interest, or predisposition on pending City matters are strictly prohibited. Any violation of prohibited conduct under this code shall encompass online activity while representing your appointed or elected position.
4. Under "RMC 2.78.070.A – Written complaint procedures", add language regarding "whistleblower" complaints to read:
 - A. Only alleged violations of the prohibited conduct section of this chapter shall be grounds for a complaint against any public official pursuant to this chapter.
Complainants are covered by whistleblower policies and the City will not retaliate nor tolerate retaliation against those who, in good faith, report suspected fraud, waste, or abuse, or participate in an investigation of a suspected violation.
5. Under "RMC section 2.78.070.5" and "RMC section 2.78.075.1.c", correct clerical error replacing "2.78.070(M)" with "2.78.060(M)" and remove "*including when the policy of the City of Riverside was established*" for alleged violations of Local Law Prohibited to read:
...For alleged violations of RMC Section 2.78.060(M), the complaining party must identify the specific section(s) of the Charter of the City of Riverside or the Riverside Municipal Code, or the policy of the City of Riverside, ~~including when the policy of the City of Riverside was established~~, that is alleged to have been violated...
6. Under RMC 2.78.070 Section E, revise the statute of limitations from 1 year to 2 years from the alleged violation date.
7. Under RMC 2.78.110, update "Inclusiveness, Community Engagement, and Governmental Processes Committee" to "Governmental Processes Committee" to reflect the name change that took place January 16, 2024.

FISCAL IMPACT:

There is no fiscal impact associated with the annual review.

Prepared by:



Jessica Newman, Chair
Board of Ethics

Attachments:

1. Exhibit A – RMC 2.78 - Code of Ethics and Conduct Redlined Proposed Revisions
2. Presentation