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# **FINDING THE PHOENIX IN THE ASHES OF 2020: USING OUR POSITIONS IN LAW TO ACHIEVE DIVERSE AND INCLUSIVE WORKPLACES THAT PROMOTE JUSTICE IN THE WORLD AROUND US**

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## Introduction

2020 brought radical change--from COVID-19 deaths and abrupt changes to our lives, like school closures, global remote work, loss of work, and a historic economic downturn impacting some industries far more than others. At the same time, we have witnessed sustained protests across the world in the Black Lives Matter movement and a SCOTUS opinion, *Bostock v. Clayton County*<sup>1</sup>, declaring that Title VII prohibits discrimination against homosexual and transgender persons in employment. Moving forward to address the impact of these changes is both critical and difficult, perhaps especially in a climate of polarization along with distrust of fundamental institutions and social structures.<sup>2</sup> From the ashes of 2020, there can come a society that is more diverse, equitable, and inclusive. Those of us working in the field of law have a special obligation to be at the forefront of creating that more just society.

## Events in 2020 Impacting Diversity, Equity, and Inclusion<sup>3</sup>

### COVID's Disparate Impacts on Minorities and Women

For reasons that are not all entirely clear, COVID-19 has impacted genders and racial groups in different ways. For instance, globally, although men and women had about the same chance of contracting the disease, men were much more likely to die from it.<sup>4</sup> Furthermore, the mortality rate for people of color was significantly higher. By some reports, African Americans have died at a rate 2.4 times higher and Asian and Latino Americans have died at a rate 2.2 times higher than white Americans.<sup>5</sup> It does not appear that the virus itself is more common in either gender or among different races, such as has been found with other diseases like sickle cell anemia.<sup>6</sup> Instead, there appear to be social and historic norms that caused COVID-19 to have a disparate impact.

There is increasing evidence that racial and ethnic minority groups are being disproportionately affected by COVID-19 as a result of inequities in the social determinants of health.<sup>7</sup> Overall, people of color have

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<sup>1</sup> 140 S. Ct. 1731 (2020).

<sup>2</sup> Frank Newport, *The Impact of Increased Political Polarization*, GALLUP (Dec. 5, 2019), <https://news.gallup.com/opinion/polling-matters/268982/impact-increased-political-polarization.aspx>.

<sup>3</sup> *Diversity*, or the different characteristics that make one individual or group of individuals different from another, is enhanced by both equity and inclusion. *Equity*, is fair treatment, access, opportunity, and advancement with a system that is mindful of individual characteristics and needs. *Inclusion* refers to an environment in which any individual or group is and feels welcomed, respected, supported, valued, and able to fully participate.

<sup>4</sup> Richard V. Reeves & Tiffany N. Ford, *COVID-19 much more fatal for men, especially taking age into account*, BROOKINGS (May 15, 2020), <https://www.brookings.edu/blog/up-front/2020/05/15/covid-19-much-more-fatal-for-men-especially-taking-age-into-account/>.

<sup>5</sup> APM Research Lab Staff, *The Color of Coronavirus: COVID-19 Deaths by Race and Ethnicity in the U.S.*, APM RESEARCH LAB (Jan. 7, 2021), <https://www.apmresearchlab.org/covid/deaths-by-race>.

<sup>6</sup> *Incidence of Sickle Cell Trait in the US*, CTRS. FOR DISEASE CONTROL AND PREVENTION, <https://www.cdc.gov/ncbddd/sicklecell/features/keyfinding-trait.html> (last visited Jan. 8, 2021).

<sup>7</sup> Centers for Disease Control and Prevention, <https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/race-ethnicity.html#fn1>

less wealth and are less likely to own their own homes.<sup>8</sup> People in minority groups often live in more crowded conditions, which increases one's risk of contracting any disease, including COVID-19.<sup>9</sup> Minorities hold more jobs that are "essential" and have therefore kept at work and in contact with more people from whom they could contract the disease.<sup>10</sup> Chronic health conditions such as heart disease and diabetes that make one much more vulnerable to COVID-19 are seen more commonly in African American, Hispanic American, and Native American populations.<sup>11</sup> And finally, minorities have historically had less access to health care, especially primary care, increasing the risk that they will fall ill and, when ill, will be sicker.<sup>12</sup>

From a gender perspective, women generally earned less, saved less, and held more insecure jobs prior to the pandemic.<sup>13</sup> They were therefore in a much more precarious economic position before the pandemic hit and less able to weather the economic downturn. Moreover, women hold a disproportionate number of "essential" jobs—from grocery store worker to health care worker to janitor.<sup>14</sup> This increased their exposure to the disease and also imposed additional time and energy constraints on them.

Moreover, women are much more likely to be single parents than men, thus, making the economic downturn harder for them to navigate.<sup>15</sup> Additionally, domestic, sexual, and gender-based violence increases during crises and disasters. Statistically, the victims of such violence are mostly women.<sup>16</sup> Add to that that children are out of school, and the elderly and infirm are locked in. Since taking care of

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<sup>8</sup> The median White family has 41 times more wealth than the median Black family and 22 times more wealth than the median Latino family. In 2016, 72 percent of White families owned their home, compared to just 44 percent of Black families. Between 1983 and 2016, Latino homeownership increased by a dramatic nearly 40 percent, but it remains far below the rate for Whites, at just 45 percent. *Wealth Inequality in the United States*, INEQUALITY.org, <https://inequality.org/facts/wealth-inequality/> (last visited Jan. 8, 2021).

<sup>9</sup> Sherita Hill Golden, M.D., M.H.S., *Coronavirus in African Americans and Other People of Color*, JOHNS HOPKINS MED. (Apr. 20, 2020), <https://www.hopkinsmedicine.org/health/conditions-and-diseases/coronavirus/covid19-racial-disparities>.

<sup>10</sup> Gloria Rodriguez, *Minorities, more likely to have jobs that make them 'essential workers,' disproportionately affected by COVID-19*, ABC11 (May 7, 2020), <https://abc11.com/minorities-coronavirus-african-american-black-latino/6160216/>.

<sup>11</sup> Rachel Nania, *Blacks, Hispanics Hit Harder by the Coronavirus, Early U.S. Data Show*, AARP (May 8, 2020), <https://www.aarp.org/health/conditions-treatments/info-2020/minority-communities-covid-19.html>.

<sup>12</sup> Selwyn M. Vickers, *Black medical leaders: Coronavirus magnifies racial inequities, with deadly consequences*, USA TODAY (Apr. 10, 2020, 12:01 PM), <https://www.usatoday.com/story/opinion/2020/04/10/coronavirus-health-inequities-deadly-african-americans-column/5124088002/>.

<sup>13</sup> U.N. Secretary-General, Policy Brief: The Impact of COVID-19 on Women (April 9, 2020), <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2020/policy-brief-the-impact-of-covid-19-on-women-en.pdf?la=en&vs=1406>

<sup>14</sup> *Pandemic's front-line work falls on women, minorities*, CBS NEWS (May 1, 2020), <https://www.cbsnews.com/news/fontline-work-women-minorities-pandemic/>.

<sup>15</sup> Ann Linde & Arancha González Laya, *What the COVID-19 pandemic tells us about gender equality*, WORLD ECON. F. (May 9, 2020), <https://www.weforum.org/agenda/2020/05/what-the-covid-19-pandemic-tells-us-about-gender-equality/>.

<sup>16</sup> *Violence against women*, WORLD HEALTH ORG. (Nov. 29, 2017), <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

family members, now including teaching, nursing, feeding, cleaning, and entertaining, falls disproportionately to women, it is they, in the main, who bear the brunt of this burden.<sup>17</sup>

The heaviest burden of COVID-19, by far, has fallen on women of color. In addition to the challenges faced by white women, women and men of color are suffering a disproportionate burden of illness and death.<sup>18</sup> The data suggests that African American, Latino American, and Native American patients were overrepresented, compared to their percentage in the community, in both hospitalizations and deaths from COVID-19.<sup>19</sup> The factors that contribute to this include living conditions, work circumstances, underlying health conditions, and lower access to medical care.<sup>20</sup>

COVID has required employers to make changes, from laying off employees, to accommodating home work environments, to altering the workplace, to revising job duties. Businesses struggling to maintain profits may ignore diversity, equity, and inclusion (DEI) efforts, even though greater effort is needed as a result of COVID's disparate impacts and studies have shown that DEI initiatives can increase profitability. DEI should be on the minds of employers as they form their business plans and their diversity, equity, and inclusion goals in 2021.

### The Black Lives Matter Protests

Amid the COVID epidemic, the world witnessed the deaths of George Floyd, Ahmaud Arbery, Rayshad Brooks, and Breonna Taylor. We saw Amy Cooper on her cell phone in the park. And we saw protests across the globe demanding an end to police brutality and all racially motivated violence against Black people. The Black Lives Matter movement has brought racial justice into the spotlight and motivated employers to not only reevaluate their diversity, equity, and inclusion practices in hiring and retention, but also consider how their businesses and workplaces can more broadly support diversity, equity, and inclusion.

### Legal Developments Impacting LGBT+

Only in recent history have laws required LGBT+<sup>21</sup> minorities to receive equal treatment.<sup>22</sup> The United States Supreme Court held in June of 2020 that discrimination on the basis of sexual orientation or

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<sup>17</sup> Belén Garijo, *COVID-19 highlights how caregiving fuels gender inequality*, WORLD ECON. F. (Apr. 24, 2020), <https://www.weforum.org/agenda/2020/04/covid-19-highlights-how-caregiving-fuels-gender-inequality/>.

<sup>18</sup> *Morbidity and Mortality Weekly Report*, CTRS. FOR DISEASE CONTROL AND PREVENTION, <https://www.cdc.gov/mmwr/index.html> (last visited Jan. 8, 2021).

<sup>19</sup> *Health Equity Considerations and Racial and Ethnic Minority Groups*, CTRS. FOR DISEASE CONTROL AND PREVENTION (July 24, 2020), <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/racial-ethnic-minorities.html>.

<sup>20</sup> *Id.*

<sup>21</sup> Variants of the term LGBT (Lesbian, Gay, Bisexual, and Transgender) include “Q” for “queer” or “questioning,” “I” for “intersex” “A” for “asexual,” and “2” for “two-spirit” applicable to Native American/First Nation individuals. The “+” refers to these variants. See <https://en.wikipedia.org/wiki/LGBT> and <https://en.wikipedia.org/wiki/Two-spirit>.

<sup>22</sup> [https://en.wikipedia.org/wiki/LGBT\\_rights\\_in\\_the\\_United\\_States](https://en.wikipedia.org/wiki/LGBT_rights_in_the_United_States)

gender identity constitutes prohibited sex discrimination under Title VII of the Civil Rights Act of 1964.<sup>23</sup> *Bostock v. Clayton County* arose from three cases in which long-time employees were fired simply because they were homosexual or transgender. In an opinion authored by recently appointed Justice Neil Gorsuch the Court reasoned that the language of Title VII prohibits discrimination “because of such individual’s . . . sex,” and even assuming the meaning of “sex” is limited to biological distinctions between male and female, courts have long held that discrimination may be based on characteristics associated with sex. So if firing a woman for “not being feminine enough” violates the law, the law is also violated when an individual is fired for being homosexual or transgender given that sexual orientation and gender identity/expression are “inextricably bound up with sex.”<sup>24</sup> Homosexuality or transgender identity need not be the sole or primary cause of the employer’s action; an employer violates Title VII when it intentionally fires an individual employee if changing the employee’s sex would have yielded a different choice by the employer.<sup>25</sup>

*Bostock* came on the heels of three recent SCOTUS cases based on equal protection of constitutionally protected family rights for same-sex spouses,<sup>26</sup> none of which was relied upon in *Bostock*. The reasoning in the *Bostock* opinion could have future application in other statutes prohibiting discrimination, however, the opinion expressly limited its application and recognized exceptions may exist where religious liberties are also at issue. Furthermore, the United States House of Representatives passed the Equality Act on May 17, 2020, which prohibits discrimination based on sex, sexual orientation, and gender identity in public accommodations and facilities, education, federal funding, employment, housing, credit, and the jury system, but this legislation remains idle in the Senate.<sup>27</sup>

The *Bostock* decision requires employers who did not previously have LGBT+ inclusive workplaces to make changes to their policies and practices to prevent discrimination against LGBT+ minorities. These changes may include expanding health insurance to address needs of transgender employees, expanding parental leave for gay parents, revising dress standards, or expanding pronouns for self-

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<sup>23</sup> *Bostock v. Clayton County*, 140 S. Ct. 1731 (2020).

<sup>24</sup> *Bostock v. Clayton Cty., Georgia*, 140 S. Ct. 1731, 1739–42, 207 L. Ed. 2d 218 (2020).

<sup>25</sup> *Id.*, 140 S. Ct. 1731, 1741, 207 L. Ed. 2d 218 (2020).

<sup>26</sup> *United States v. Windsor*, 570 U.S. 744, 133 S. Ct. 2675, 186 L. Ed. 2d 808 (2013) (federal law limiting definition of marriage and spouse to one man and one woman, which denied benefit of spousal deduction for purposes of estate taxes, unconstitutionally denied equal protection under the Fifth Amendment to the United States Constitution); *Obergefell v. Hodges*, 576 U.S. 644, 135 S. Ct. 2584, 192 L. Ed. 2d 609 (2015) (states may not bar same-sex couples from marrying on same terms as those available to opposite-sex couples and states must recognize lawful same-sex marriages registered in other states); *Pavan v. Smith*, 137 S. Ct. 2075, 198 L. Ed. 2d 636 (2017) (statute denying non-biological spouse’s recognition as parent for same-sex spouses while allowing it for opposite-sex spouses was unconstitutional denial of benefit linked to marriage).

<sup>27</sup> <https://www.congress.gov/bill/116th-congress/house-bill/5/all-actions?overview=closed#tabs>

identification. Exceptions for religious liberties are not entirely clear and a SCOTUS decision on the issue is pending.<sup>28</sup>

### Political and Social Polarization

A recent study by the Dialogue Project concluded that both globally and in the United States individuals identified the inability of people to engage in respectful dialogue with those who have opposing views as a significant problem.<sup>29</sup> Certainly, the assault on the Capitol Building on January 6, 2021 was a graphic display of the problem. Globally, politics, race/ethnicity, and sexual orientation were the three topics identified most frequently as the most difficult to talk about with others holding different views, while in the United States the top three topics were politics, race, and immigration. Some thought racial unrest made it easier to engage in respectful dialogue while others thought racial unrest made it more difficult to have respectful conversations with those holding different views.<sup>30</sup> But, either way, scholars have documented the rise of “affective polarization,” or animosity between Democrats and Republicans. Many are unwilling to socialize across party lines or even partner with opponents in a variety of other activities.<sup>31</sup> In 2020, such animosity touched issues such as whether to wear a mask and the validity of election results. These trends and phenomena may present challenges to finding DEI solutions in the workplace.

### Improving Diversity, Equality, and Inclusion

The response triggered by recent world events woke up the country to the need for examination and change. Now that issues of justice have national attention, organizations can and should take concrete steps to improve their diversity, equity, and inclusion and to promote more cooperative, inclusive, and tolerant work and home communities.

Businesses and institutions who show they value DEI are more likely to attract diverse employees, whether by doing business with minority-owned companies, partnering with public interest groups or charities that benefit minorities, donating to organizations whose work benefits minorities, or handling paid or *pro bono* legal work that benefits minorities. Also, businesses or law firms who make significant efforts to connect with minorities where they are to invite them to apply or who work with organizations that screen and pool minority candidates will have a better chance of garnering a pool of diverse applicants. For example, the National LGBT Bar holds a Lavender Law Conference and Career Fair every year where corporate sponsors can recruit diverse lawyers.

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<sup>28</sup> *Fulton v. City of Philadelphia*, 922 F.3d 140 (3d Cir. 2019), cert. granted sub nom. *Fulton v. City of Philadelphia, Pennsylvania*, 140 S. Ct. 1104, 206 L. Ed. 2d 177 (2020).

<sup>29</sup> Sarah Jackson, *The Dialogue Divide Research Report*, THE DIALOGUE PROJECT (Oct. 8, 2020), <https://www.slideshare.net/SarahJackson86/the-dialogue-project?ref=>.

<sup>30</sup> *Id.* at 3.

<sup>31</sup> Iyengar, et al., *The Origins and Consequences of Affective Polarization in the United States*, 22 ANNUAL REV. OF POL. SCI. 129, 136-39 (May 2019).

But attracting diverse employees is just one piece of the puzzle. Inclusion is an active process in which diversity is valued as a resource. Instead of valuing people despite their differences (or similarities), they are valued because of those differences.<sup>32</sup> Key elements to creating an inclusive environment that values diversity and equity include defining a vision for the organization, understanding the dynamics of change, and designing an appropriate strategy.<sup>33</sup>

The most significant challenge to changing culture is that there is not a single solution to this complicated problem. The vision for the desired outcome, while in generalities may be the same across organizations, can differ quite significantly from one organization to the next. Hence, the need for an organization to define its own desired outcome and vision for an inclusive environment.

Once the outcome is envisioned and designed, it must be implemented. There are seven factors which have been identified as the dynamics of change.<sup>34</sup>

First, when change is implemented, people feel awkward and uncomfortable. Even those who want change find change difficult because it means doing things differently than they have been done in the past. Learning and relearning is hard.

Second, people initially focus on what they have to give up because of a change. It is important, therefore, to have a message that focusses on what people will gain as a consequence of the change.

Third, people often feel alone and ask, “Why me?” even if everyone else is going through the same change. Change can often be experienced as polarizing because of three core paradoxes of inclusion: self-expression and identity, boundaries and norms, and safety and comfort.<sup>35</sup> These concerns should be validated and addressed.

Fourth, people can handle only so much change at a time. Consequently, an effective plan must have a strategy, a focus, and a set of priorities.

Fifth, the speed at which each person can handle change is different. To effect change in a group then, the plan needs to take into account different responses to that change.

Sixth, people will be concerned about having enough resources to do what is expected of them after the change is in place. Diversity and inclusion efforts historically have been under-supported, unfunded, and

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<sup>32</sup> DIVERSITY AT WORK: THE PRACTICE OF INCLUSION 3-54 (Bernardo M. Ferdman & Barbara R. Deane eds., 2014).

<sup>33</sup> PsycInfo Database Record, American Psychological Association (2020).

<sup>34</sup> Ken Blanchard, *The Seven Dynamics of Changes*, SELLING POWER (Feb. 2, 2010), <https://www.sellingpower.com/2010/02/02/3745/the-seven-dynamics-of-change>.

<sup>35</sup> Bernardo M. Ferdman, *Paradoxes of Inclusion: Understanding and Managing the Tensions of Diversity and Multiculturalism*, 53 J. APPLIED BEHA. SCI. 235 (2017).

under-recognized as work-related responsibilities. Thus, a successful program is championed and supported by leadership and budgets.

Seventh, if the pressure is taken off, people revert back to old behaviors. Vigilance and mindfulness are therefore essential in any long-term systemic or organizational change.<sup>36</sup>

These dynamics should be kept in mind as an appropriate strategy to effect change is developed for the organization. Strategies could include signing up to support organizations whose mission is to increase diversity and inclusion. They also could include intentional diversification of partners and peers for the organization. Another strategic move would be reaching out to diverse young people who are or might be interested in entering the organization's business (e.g., young lawyers, claims handlers, or risk managers) and providing to them opportunities and mentors. This diversifies the perspective provided to the organization, trains future leaders, and increases the level of diversity, which ultimately results in more equity and inclusion within the organization.<sup>37</sup>

The organization's strategy, to be truly effective, should target systemic, cultural, and behavioral organizational change. To do that, organizations are encouraged to engage gatekeepers, mitigate bias, and optimize decision making related to selection and promotion.<sup>38</sup> Gatekeepers are decision makers, those in positions of power who select, promote, and support employees.<sup>39</sup> In most organizations, gatekeepers "receive only minimal training in interviewing, use their personal theories of what constitutes merit and how best to judge it, and receive little feedback on the quality of their decisions."<sup>40</sup> Systemic change comes only when these members of the organization are engaged and committed to selection, promotion, and support of employees based on the employees' contribution to the organization and not because of their similarity or attractiveness to gatekeepers.

To reward employees based on their personal contributions and not on their personal characteristics, the organization must recognize and accept that, even with relatively measurable criteria such as billable hours, the decision-making process is, in the main, subjective.<sup>41</sup> The objective criteria are rarely determinative in employment decisions. Instead, they serve as a threshold for being one of the employees considered, are systematically overestimated for dominant group members, and are often

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<sup>36</sup> Anna Valdez, *A Call to Action for 2021*, 16 TEACHING AND LEARNING NURSING 1, (2021).

<sup>37</sup> Kirk A Taylor, *EDI(torial): equality, diversity, and inclusion and platelets - 2021*, PLATELETS (Dec. 7, 2020), <https://www.tandfonline.com/doi/full/10.1080/09537104.2020.1854542?scroll=top&needAccess=true>.

<sup>38</sup> Claartje J. Vinkenburg, *Engaging Gatekeepers, Optimizing Decision Making, and Mitigating Bias: Design Specifications for Systemic Diversity Interventions*, 53 J. APPLIED BEHA. SCI. 212 (2017).

<sup>39</sup> Sara Bosley, John Arnold & Laurie Cohen, *How other people shape our careers: A typology drawn from career narratives*, 62 HUMAN RELATIONS 1487 (2009).

<sup>40</sup> Lauren A. Rivera, *Go with your gut: Emotion and evaluation in job interviews*, 120 AMERICAN J. SOCIOLOGY 1339 (2015).

<sup>41</sup> Aparna Joshi, Jooyeon Son & Hyuntak Roh, *When Can Women Close the Gap? A Meta-Analytic Test of Sex Differences in Performance and Rewards*, 58 ACAD. MGMT. J. 1516 (2015); Elissa L. Perry, Alison Davis-Blake & Carol T. Kulik, *Explaining Gender-Based Selection Decisions: A Synthesis of Contextual and Cognitive Approaches*, 19 ACAD. MGMT. REV. 786 (1994).



dropped from the deliberations altogether.<sup>42</sup> This practice permits decisions to be made based on biases or cognitive distortions.

The degree of bias does not have to be large to have negative and significant effects, especially over time.<sup>43</sup> Hence, it is important to recognize implicit bias in hiring and promotions even at the lowest levels of the organization. It is then important to develop clear criteria for hiring, compensation, and promotion, “instead of relying on subjective impressions [or] ambiguous prototypes.”<sup>44</sup> And, finally, it is important to measure success of the intervention over time.

## Conclusion

A diverse and inclusive work environment is one in which employees are treated with respect, employees are valued for their strengths, and leaders do what is right.<sup>45</sup> Environments such as these do not develop overnight, but 2020 ushered in the opportunity for us to push our own workplaces and environments in that direction.<sup>46</sup> Being diverse and inclusive is smart for business which is “the highest praise a cause could receive”.<sup>47</sup> Let’s be at the front of that.

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<sup>42</sup> Marieke van den Brink, et al., *Inflating and down playing strengths and weaknesses—Practicing gender in the evaluation of potential managers and partners*, 32 SCANDINAVIAN J. MGMT. 20 (2016).

<sup>43</sup> Richard F. Martell, Cynthia G. Emrich & James Robinson-Cox, *From bias to exclusion: A multilevel emergent theory of gender segregation in organizations*, 32 RSCH. ORGANIZATIONAL BEHAV. 137 (2012).

<sup>44</sup> Naomi Ellemers, *Women at Work: How Organizational Features Impact Career Development*, 1 POL’Y INSIGHTS FROM BEHAV. AND BRAIN SCIS. 46 (2014).

<sup>45</sup> Ella Washington & Camille Patrick, *3 Requirements for a Diverse and Inclusive Culture*, GALLUP (Sept. 17, 2018), <https://www.gallup.com/workplace/242138/requirements-diverse-inclusive-culture.aspx>.

<sup>46</sup> Nadine Channaoui, et al., *Summary report of the 2019 Diversity and Inclusion Task Force of the National Society of Genetic Counselors*, 29 J. GENETIC COUNS. 192 (2020); Cordelia Fine & Victor Sojo, *Women’s value: beyond the business case for diversity and inclusion*, 393 LANCET 515 (2019); Christie Smith & Kenji Yoshino, *Uncovering talent: A new model of inclusion*, Deloitte (2018), <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/about-deloitte/us-about-deloitte-uncovering-talent-a-new-model-of-inclusion.pdf>; Stephanie J. Creary, PhD, *Leading Diversity in Organizations*, WHARTON U. PA. (Feb. 28, 2018), <https://ideas.wharton.upenn.edu/wp-content/uploads/2018/07/CrearyTipsandTakeaways022818.pdf>.

<sup>47</sup> ANAND GIRIDHARADAS, WINNERS TAKE ALL: THE ELITE CHARADE OF CHANGING THE WORLD (2018).