

BOSTON COLLEGE

CENTER FOR CORPORATE CITIZENSHIP

CARROLL SCHOOL OF MANAGEMENT

Diversity, Equity, and Inclusion Advisory Board



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Letter From the Chair

Dear Esteemed Colleagues,

As the co-chairs of the Advisory Board on Diversity, Equity, and Inclusion (DEI), we appreciate that affirmation we have heard from many of you regarding the critical importance of DEI to business success. In a world that is increasingly interconnected and diverse, it is imperative that we, as corporate leaders, prioritize creating inclusive and equitable environments within our organizations.

Recent events have underscored the urgent need for change and the role that corporations must play in driving progress. The racial inequities laid bare by the pandemic, coupled with the ongoing struggle for racial and gender equality, have highlighted the systemic barriers that continue to hinder equity. It is our responsibility to create spaces where every individual, regardless of their background, can thrive, contribute, and achieve their fullest potential.

Achieving inclusion is not only a societal imperative, but also a business need. Multiple studies suggest that diverse and inclusive companies outperform their peers in terms of innovation, employee engagement, and financial performance. By fostering a culture that values and celebrates diversity, we can tap into a wider pool of talent, perspectives, and ideas, ultimately driving our organizations forward.

Making commitments to achieve these goals is a start. We must also take concrete actions to embed these principles into the very fabric of our organizations. This includes setting measurable goals, providing training and resources, and holding ourselves accountable for progress. It also means actively listening to and amplifying the voices of those who have traditionally been underrepresented and marginalized.

This year, we have had an unfortunately large number of opportunities to hear from specific groups about how they have experienced



HEDIEH FAKHRIYAZDI Chief Diversity Officer White & Case LLP



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discrimination or exclusion. We know that this puts an additional burden of care and emotional drain on those of us who are facilitating these listening sessions. Being part of a community of professionals like this group has provided a forum to share our experiences and strategies for moving forward and hear from experts on particular aspects of our work. This briefing is intended to share with our community information and insights we have had the opportunity to access through our Advisory Board.

As corporate leaders, we have a unique platform to lead by example. Together, we can build a more just, equitable, and inclusive future for all. Let us seize this moment and commit to making DEI a core value in all that we do. The journey ahead may be challenging, but the rewards—for our employees, our companies, and society as a whole—are immeasurable. Join us.

Sincerely,

HEDIEH FAKHRIYAZDI

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Legal Challenges to Affirmative Action

Affirmative action has been challenged in a way that has all DEI professionals on high alert. With the recent Supreme Court of the United States (SCOTUS) decision in Students for Fair Admissions, Inc. (SFA) v. President & Fellows of Harvard College (Harvard) and SFA v. University of North Carolina (UNC), the court held that the admissions programs of both Harvard and UNC violated the Equal Protection Clause of the 14th Amendment, effectively overturning the precedents set by previous landmark cases.¹

The debate surrounding affirmative action in college admissions can be traced back to the 1978 case of Regents of the University of California v. Bakke. This case introduced the concept of diversity as a valid educational goal in university admissions, with four justices holding that the use of race as one criterion in admissions decisions was constitutionally permissible.² The Bakke decision laid the groundwork for considering race as a factor in admissions, but it also prohibited the use of racial quotas.

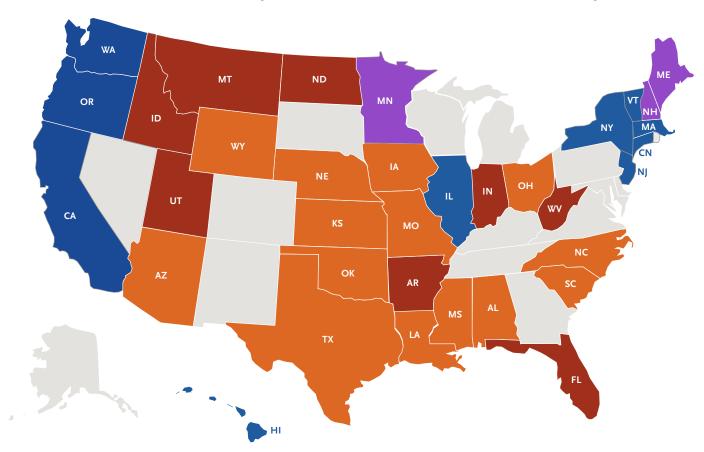
In 2003, the Grutter v. Bollinger case reinforced the Bakke ruling. The Supreme Court applied strict scrutiny to conclude that public schools may consider an applicant's race as one factor among many in making an admission decision.³ The court held that the University of Michigan Law School's narrowly tailored use of race in admissions decisions furthered a compelling interest in obtaining the educational benefits that flow from a diverse student body.

Though this decision is centered on higher education, this shift in legal interpretation has raised questions about the future of affirmative action and its impact on diversity initiatives in all businesses. It has also emboldened some state lawmakers to pursue anti-DEI legislation.

Private enterprises and their DEI initiatives are concerned about the additional scrutiny and litigation that may be focused on company-sponsored scholarship, internship, and other pipeline programs focused on attracting a more diverse and representative workforce. Corporate social responsibility (CSR) professionals are now focusing on protecting their work and advancing the field considering these new developments.

BILLS INTRODUCED EITHER IN SUPPORT OF OR AGAINST INTEGRATING ESG PRINCIPLES INTO INVESTMENT DECISIONS

- 'Blue state' that has considered pro-ESG legislation in 2023 'Blue state' that has considered anti-ESG legislation in 2023
- 'Red state' that has considered anti-ESG legislation in 2023 (Red state' that has enacted anti-ESG legislation 2023)



Source: Harvard Law School Forum on Corporate Governance, State Net FIGURE 1

Implications for Corporations

while the recent SCOTUS decisions are focused primarily on university settings and diversity in education, assertions that the ruling renders all race-conscious actions by private employers unlawful are not explicitly supported by the opinion itself. Recent Supreme Court cases have illustrated the court's nuanced approach toward race-conscious acts outside the university domain, suggesting that the ruling's applicability in non-university settings may be more complex.

Beyond diversity, private employers may still have other viable rationales to consider race in certain contexts, such as remedying past discrimination, addressing workplace imbalances, or fulfilling mission-driven objectives. These rationales might still be permissible under the law, providing organizations with alternative avenues to pursue their DEI goals.

Firms must carefully navigate the potential legal implications of the recent Supreme Court decision when assessing their DEI initiatives. The level of risk tolerance associated with



It remains lawful for employers to implement diversity, equity, inclusion, and accessibility programs that seek to ensure workers of all backgrounds are afforded equal opportunity in the workplace."8

CHARLOTTE A. BURROWS

EEOC Chair

on Supreme Court Ruling on College Affirmative Action Programs

these programs should be a primary consideration. Initiatives that explicitly exclude or identify participants based on race may face higher legal risks. To mitigate potential legal challenges, practitioners running DEI programs should consult with their legal departments to thoroughly assess the legal risks associated with their specific initiatives. This collaboration can help ensure compliance with the evolving legal landscape and minimize the likelihood of legal opposition. It is worth noting that legal scrutiny varies between gender-specific and race-specific initiatives, with gen-

2022	2024	2027	
Diversity, equity, and inclusion	0	•	0
Employee health and wellness	0	+1	+2
GHG reduction	+1	-1	-1
Sustainable use of natural resources	+2	0	+2
ESG reporting	-2	0	-2
Employee safety	+6	+2	-1
Data protection and privacy	0	0	0
Monitoring supply chain (sustainability)	-3	-2	+4
Disaster preparedness/relief/recovery	+2	0	+2
Monitoring supply chain (human rights)	-2	0	-2
Community economic development	+2	+5	+3
Product lifecycle management	+3	+2	-2
Formal stakeholder engagement	-4	-2	0
Participation in standards setting	-4	-2	+1
Employee volunteer programs	+1	0	+1
Waste reduction	-2	-3	-7
Corporate giving	0	0	0

Source: Boston College Center for Corporate Citizenship. (2024). State of Corporate Citizenship 2024.

FIGURE 2

Executive Perspective: Corporate Citizenship Priorities—Past, Present, and Future

This chart compares corporate executives' current priorities to those of the previous study and predicts what the landscape might look like going forward. DEI was the top priority among executive respondents back in 2022 as well as in 2024, and this trend is expected to continue in 2027. Looking down the list, none of the practices are going away, but which command the greatest prioritization changes from study to study.

der-focused affirmative action potentially encountering less legal opposition compared to race-based programs. As such, firms should carefully evaluate the specifics of their DEI efforts and work closely with legal experts to navigate this complex issue.

Additionally, considering whether potential plaintiffs have standing to sue, meaning they were directly affected by a program's exclusion, is crucial. This can help mitigate the risk of legal action, as individuals without standing may not have grounds for a lawsuit. Firms should carefully evaluate their DEI programs to identify areas of vulnerability and take proactive steps to ensure compliance with the evolving legal landscape.

While the Harvard case may limit the use of race as a factor in university settings,

companies can still argue for the importance of diversity in improving representation, product development, and financial performance. The business case for diversity, supported by research showing that diverse organizations perform better, remains a compelling argument. As a business interest, DEI would likely be more secure from attack, as the court has historically been protective of business interests. Companies should closely monitor legal developments and adapt their DEI strategies accordingly to ensure compliance and continue fostering diverse and inclusive workplaces.

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Companies should consider what their differentiated employee value proposition is. Are their benefits comprehensive and inclusive; for instance, parental leave for non-gestating parents, IVF support, grief leave for kinfolk outside of immediate family members as needed in certain communities? Additionally, examining internal processes such as hiring and development with a lens to bias mitigation can help remove barriers to recruiting, retaining, and developing team members, particularly from equity-seeking groups.

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Recruiting and retention are grounded in sentiments and experiences of inclusion and belonging. When someone is considering an employer, they are asking themselves if they feel as though they will belong. When evaluating whether they will stay at a company, they are considering when they do belong. Cultures of inclusion and belonging are not what companies say they are, but rather what employees experience.



Does Your Commitment to DEI Include Making Your EEO-1 Data Public?

A companies face increasing pressure to demonstrate their commitment to DEI, the decision to publicly disclose EEO-1 data has become a critical consideration. While transparency around workforce composition can offer numerous benefits, companies must also navigate the complex landscape of legal, reputational, and political risks. This article explores the challenges and opportunities associated with disclosing EEO-1 data and provides guidance for companies seeking to make informed decisions.

EEO-I data refers to the demographic information companies are required to report annually to the U.S. Equal Employment Opportunity Commission (EEOC)⁵. This data provides a breakdown of a company's workforce by gender, race, and ethnicity across various job categories. Private employers with 100 or more employees and federal contractors with 50 or more employees are required to submit EEO-I reports



Source: BCCCC analysis of publicly available EEO1 data reported by 287 companies 2019-21.

FIGURE 3

Men in the Workforce by Race/Ethnicity: Executives vs Total Workforce

How to Read: BCCCC conducted a review of publicly available EEO-1 data among 287 companies. Demographic profiles below the line are underrepresented when indexed against overall employee demographic profiles. Demographic profiles above the line are overrepresented when indexed against overall employee demographic profiles.

annually. The EEOC uses this data to enforce federal anti-discrimination laws and to analyze employment patterns.

The decision to disclose EEO-I data can have significant implications for companies. Transparency around workforce composition can help build trust with stakeholders, attract diverse talent, and demonstrate progress toward DEI goals. Research has also shown that companies with more diverse leadership teams tend to outperform their less diverse peers financially.

In recent years, there has been a growing demand from investors, employees, and the public for companies to voluntarily disclose this data as a means of demonstrating their commitment to DEI. In a recent study conducted by JUST Capital, the number of Russell 1000 companies that publicly disclose intersectional data detailing gender, race, and ethnicity by job category from their EEO-1 reports or equivalent has grown substantially, from 3% in 2019 to 34% in 2022. Companies typically share their EEO-1 data through various channels, including environmental, social, and governance (ESG) reports, DEI reports, and dedicated webpages on their corporate websites.

Moreover, the study found that companies that publicly disclosed EEO-I or equivalent data delivered higher returns than those that didn't disclose, outperforming by 7.9% over the trailing one-year period ending in 2022.⁷ This finding suggests that investors are increasingly viewing workforce diversity and transparency as a key factor in assessing a company's long-term value and risk profile.

However, companies must also consider the potential risks associated with disclosing EEO-I data. In a highly politicized environment, companies may fear backlash or legal challenges if their data reveals disparities in representation or promotion rates. Some companies have expressed concerns about reverse discrimination lawsuits or being targeted by media outlets seeking to highlight DEI shortcomings. Additionally, companies may worry that disclosing EEO-I data could expose them to competitive disadvantages if their workforce composition is not as diverse as their peers'.

The decision-making process around EEO-I data disclosure is heavily influenced by public perception and fear of backlash. In today's social media-driven world, companies are acutely aware of the potential for negative publicity and reputational damage if their DEI efforts are perceived as inadequate or insincere. This fear of backlash can lead to a reluctance to disclose EEO-I data, particularly if the data reveals

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Companies need to consider succession plans and talent pipelines. You can tell the future demographics of a company's leadership by looking at succession plans and asking, "Who is and who isn't being developed?"

significant disparities or a lack of progress toward DEI goals.

Moreover, the highly politicized nature of DEI issues can make companies hesitant to take a public stance on these topics. In an environment where DEI initiatives are often framed as divisive or controversial, companies may worry that disclosing EEO-I data could alienate certain stakeholders or invite political backlash. This fear of political backlash can be particularly acute for companies operating in industries or

regions where DEI issues are highly contested.

Despite the challenges, many companies are choosing to move forward with EEO-I data disclosure as a means of advancing their DEI efforts and building trust with stakeholders. To navigate this process effectively, companies should consider the following actions:

- I. Engage stakeholders: Consult with employees, investors, and other key stakeholders to understand their expectations and concerns around EEO-I data disclosure. Consider conducting surveys, focus groups, or town hall meetings to gather feedback and build support for transparency.
- 2. Assess risks and opportunities: Conduct a thorough analysis of the potential legal, reputational, and political risks associated with disclosure, as well as the potential benefits in terms of talent attraction, investor relations, and brand reputation. Work with legal counsel to ensure that disclosure practices comply with relevant laws and regulations.
- 3. Develop a communication strategy: Prepare a clear and transparent communication plan to accompany the release of EEO-I data, emphasizing the company's commitment to DEI and the actions being taken to address any disparities. Consider providing context around the data, such as industry benchmarks or historical trends, to help stakeholders interpret the information.

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Creating transparency around goals and successes are pivotal in dismantling fear or misunderstanding and creating DEI champions.

- 4. Benchmark against peers: Review the disclosure practices of peer companies to understand industry norms and identify best practices. Consider participating in industry coalitions or working groups focused on advancing DEI transparency and standardization.
- **5. Focus on progress:** Emphasize the com-

pany's progress toward DEI goals over time, rather than solely focusing on current representation levels. Set clear, measurable targets for improving workforce diversity and regularly report on progress toward those goals.

For companies, the decision to disclose EEO-1 data presents both challenges and opportunities. Transparency around workforce composition can help build credibility

and trust with employees and other stakeholders. It can also provide a powerful tool for driving accountability and progress toward DEI goals. By regularly reporting on workforce demographics, companies can identify areas for improvement, track progress over time, and make data-driven decisions about resource allocation and program design.

However, companies must also be prepared to navigate the potential risks and backlash associated with disclosure. This may require working closely with legal, HR, and communications teams to develop a strategic approach that balances transparency with risk mitigation. It may also require engaging in difficult conversations with leadership and other stakeholders to build support for disclosure and to address any concerns or resistance.

To effectively encourage more transparency about your company's workforce, DEI professionals should consider the following actions:

- **I. Stay informed:** Keep abreast of the latest developments related to your company's recruitment, hiring, and promotion practices, including the teams responsible for disclosing your EEO-1 data.
- **2. Educate and engage:** Raise awareness among internal stakeholders, including senior management and the board, about the importance of data transparency and how transparency can benefit the company by attracting talent.
- **3. Collaborate cross-functionally:** Work closely with HR, legal, and communications teams to ensure coordinated disclosure practices and effective response to any potential criticism.
- **4. Drive innovation:** Use EEO-I data to identify areas for improvement and leverage the company's DEI commitment as a catalyst for innovation, positioning the company as a leader in DEI.

Ultimately, the decision to disclose EEO-I data is a complex one that requires careful consideration of the unique risks and opportunities facing each organization. While transparency around workforce composition can offer numerous benefits, companies must also navigate the challenges of a highly politicized and rapidly evolving land-scape. By engaging stakeholders, assessing risks and opportunities, developing a clear communication strategy, benchmarking against peers, and focusing on progress, companies can use EEO-I data disclosure as a powerful tool for advancing the

hiring, retention, and promotion of their workforce and building trust with stakeholders.

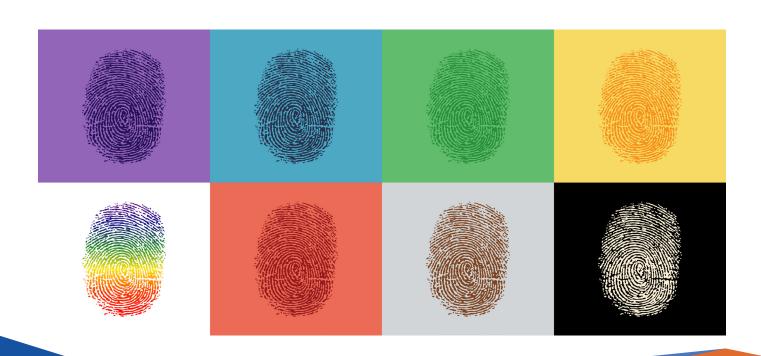
For DEI leaders, managing the disclosure process requires a strategic and collaborative approach that balances transparency with risk mitigation and uses data to drive meaningful action and progress toward a more diverse, equitable, and inclusive workplace. As more companies embrace transparency and standardization around EEO-1 data disclosure, DEI professionals have an opportunity to lead the way in driving positive change and demonstrating the business case for diversity and inclusion. By proactively addressing the challenges and opportunities associated with EEO-I data disclosure. companies and DEI professionals can help to create a more equitable and inclusive future for all.

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Recruiting and retention are grounded in sentiments and experiences of inclusion and belonging. When someone is considering an employer, they are asking themselves if they feel as though they will belong. When evaluating whether they will stay at a company, they are considering when they do belong. Cultures of inclusion and belonging are not what companies say they are, but rather what employees experience.

Beyond internal company rhetoric/ marketingcompanies need to evaluate employee experiences (across the employee lifecycle) thoughtfully and rigorously.



Drafting Statements on Social Issues

Thinking about speaking out on a certain social issue? Ask yourself:

Does the issue directly affect the company's operations or the communities it serves? When considering whether to speak out on social issues, first consider how the issue in question impacts the company's supply chain, production processes, distribution channels, and its employees. Furthermore, consider the extent to which the issue affects the welfare, safety, or well-being of the communities in which the company operates. Speaking out on social issues that impact a company's ability to attract and retain talent or prevent damage to the firm's bottom line might be in line with expectations of stakeholders, but consider how speaking out might affect the business as well.

Does the issue pose a threat to or resonate with the company's core values and mission?

Consider whether the issue contradicts or undermines the principles and beliefs that the company prioritizes. Does the company have a record of successfully advocating for or addressing similar issues? Whether the issue aligns with the company's stated mission, vision, and guiding principles is critical for deciding if a statement needs to be drafted. If the potential impact of the issue on the company's reputation and brand identity has the potential to be large, addressing the issue might be worthwhile for the long-term strategic goals and objectives of the company.

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We focus more on our internal actions and communications than external commentary. Overall, any response, internal or external, has been received positively. There is a continuum between saying too much and not saying enough—we endeavor to seek equilibrium and strive to ensure our words match our actions and what our employees are experiencing.

Can the company authentically and effectively influence the issue at hand?

Keep in mind the difference between whether a company should speak out on a certain social issue and whether or not it can. The company needs to have the expertise, resources, and capabilities relevant to the issue for the statement to be authentic and influential. While a certain social issue might be relevant to the firm's mission and strategic objectives, the company might not have the resources necessary to achieve the desired outcomes. Before speaking out, the company needs to be sure that its actions are likely to result in meaningful and positive change regarding the issue, as anything to the contrary can undermine brand reputation and upset stakeholders.

Is there alignment between the decision to speak out and the perspectives of both internal and external stakeholders?

The decision to speak out on a particular social issue cannot come from a select few. Social statements have potential to impact the company's relationship with key stakeholders, including trust, loyalty, and brand perception. Make an attempt to gauge whether the company's employees, management, and board members support or oppose the issue. Consider whether there is a consensus or disagreement among such stakeholder groups, and think about the implications for the company's supplier, partners, and other stakeholders as well. If you've responded to a similar issue in the past, consider the successes and failures and take the time to think about how the repercussions could affect the relationships the company has with both internal and external stakeholders.



What are the steps for drafting a statement on social issues?

1

Develop (and refine) a systematic framework for assessing when to draft a statement on social issues.

Define specific criteria or factors that will be used to evaluate whether a social issue warrants a statement from the company. Consider factors related to the company's stakeholders, mission, and ability to authentically cause change. Ensure all key stakeholders within the organization are involved to garner buy-in, and assess the timing of addressing the social issue carefully. Some social issues demand an immediate response, while others may benefit from a more measured and systematic approach. Regularly review and refine the framework to ensure its effectiveness and ability to adapt to stakeholder expectations over time.

2

Connect the rationale behind speaking out with the company's stated mission, purpose, or objectives.

Clearly articulate the connection between the company's mission, purpose, or objective and the decision to speak out on the social issue. Integrate the rationale for speaking out into the company's broader CSR strategy and ensure that addressing the issue aligns with existing initiatives and commitments. Be sure to emphasize how the company's stance on a particular social issue reflects shared values with stakeholders, including customers, employees, and the community, to help foster alignment.

3

Secure support and alignment from stakeholders before publicly addressing the issue to bolster credibility.

Work to build stakeholder consensus around the company's proposed stance on social issues to prevent internal divides. Solicit input and feedback from stakeholders such as employees, board members, the community, and even suppliers to ensure their perspectives are considered in the decision-making process. Consider collaborating with external partners, such as advocacy groups or industry associations, to amplify the company's message. Ensure that the company is continuously monitoring stakeholder feedback and sentiment regarding the statement on the social issue, and be prepared to adapt the approach as needed to address shifting

expectations.

Prioritize transparency by acknowledging any contributions the company may have made to exacerbate the issue and outline concrete steps for remediation.

If necessary, begin by acknowledging any past actions or contributions that the company may have made to exacerbate the social issue. Even if it may be difficult to admit, being transparent about the company's role can help avoid "social-washing" the extent of the company's impact and subsequent statement. Clearly outline concrete steps that the company plans to take to remediate the issue, and set clear goals and timelines for implementing such efforts. Regularly communicate updates on the company's progress to maintain stakeholder trust and confidence in the company's commitment to making meaningful change.

Exercise careful consideration regarding the individuals responsible for drafting the statement and the language therein.

Select individuals with expertise in communication, public relations, and the specific social issue at hand to draft the statement and ensure that it is well-informed. Collaborate across departments within the company such as legal, communications, and marketing to ensure that the statement reflects a holistic understanding of the issue and aligns with the company's overall strategy, not just its CSR goals. Conduct thorough reviews of the drafted statement, incorporating feedback from internal and external stakeholders as needed. Revise the language as necessary to address any



Pay Equity

The wage disparity between women and men has been well documented for decades and across many U.S. industries. Overall, salaried women who work full time earn 83.4% of what male full-time wage and salary workers earn.9 The trend even holds true among corporate citizenship professionals: Our research has found that among the reported median salaries of respondents in the U.S., women earn just 88% of what men earn in corporate citizenship roles.10 Although this gender wage gap has improved over time, it has flattened out in recent years.

Historically, a pay gap is also evident among people of color when their salaries are compared to the salaries of White men. This is true across the salaries of both men and women in the U.S., with the widest gap existing for Black individuals, who earn 75% of White individuals' pay in median hourly earnings. On average, hourly wages for Black and Hispanic men are \$15 and \$14, respectively, compared with \$21 for White men. Only the hourly earnings of Asian men (\$24) are higher."

The explanation of the pay gap is complex. A 2015 study argues that 33% of the gender pay gap in the U.S. is "unexplained" and potentially caused by workplace gender bias. ¹² In recent years, companies have more openly communicated their pay policies and remuneration levels to the public. The growing trend of companies reporting pay equity data offers an opportunity for DEI practitioners to advocate for transparency.

Companies often use two key measures when reporting their pay data: the mean and the median. Because the mean pay gap is more sensitive to extreme values (such as very high or very low salaries), the median pay gap is generally preferred for reporting purposes, as it represents the middle value in a dataset and is less sensitive to outliers. As such, the median a more stable and reliable measure of the typical pay gap experienced by most employees. Additionally, using the median aligns with best practices and regulatory guidance, such as the UK's Gender Pay Gap Information Regulations¹³, which specify that companies should report median hourly pay gaps and median bonus pay.



By comparing the mean pay gap to the median, organizations can identify the impact of high earners on overall pay disparities and assess potential "glass ceiling" effects, wherein certain groups may be underrepresented in high-paying leadership positions. This allows for a more comprehensive picture of their pay equity situation and demonstrates their commitment to transparency and fairness. Such an approach enables organizations to identify areas for improvement, develop targeted strategies to address disparities, and track progress over time. As more companies adopt reporting on their racial and gender pay gaps and work toward closing the pay gap through initiatives such as training programs and employee resource groups (ERGs), we can expect to see greater strides toward achieving genuine pay parity across gender, race, and ethnicity in the workplace.

ADVICE FROM THE BOARD



WHY DEI CONTINUES TO BE IMPORTANT

"People fear what they don't understand and hate what they cannot conquer."

This quote is integral to DEI work in many ways, and it especially applies when getting stakeholders on board with DEI efforts. Rightfully so, the work in this field is centered on marginalized and disenfranchised people, but we must be very intentional that everyone, especially the majority and/or allies, understands their role in cultivating an inclusive culture, as well as why these efforts are in place.

Inclusion starts with I and includes US (literally).

Everyone is diverse in multiple ways, and everyone wants to be treated equitably. It is crucial that majority members of an organization see themselves as part of DEI just as much as minority/ underrepresented members. DEI is for and about everyone. It should be embedded and integrated into the fabric of an organization. It is the human condition, not a demographic disposition, to want to belong and be valued.

Employees can tell when DEI is treated like a company checkbox.

Engage senior leaders from across departments to champion DEI efforts; employees will feel more motivated and trusting in a firm's DEI efforts if they feel that these come from a genuine place and that DEI is an integral part of the organization's culture.

Engaging all employees in DEI efforts is key to fostering an inclusive workplace culture.

- 1. It's crucial that leadership actively advocates for DEI initiatives. When employees see senior leaders' commitment to DEI, they're more inclined to engage and participate.
- 2. Offering comprehensive DEI training to all employees is critical. Whether through workshops, seminars, or online courses, such training enhances awareness and comprehension of diversity issues.
- 3. Regularly reviewing and refining HR policies and practices is essential to ensure they are bias-free and inclusive. This encompasses everything from recruitment and performance evaluations to promotions and benefits offerings.
- 4 DEI endeavors should be a continuous journey of improvement. Seeking regular feedback from employees and adjusting strategies based on their input and evolving organizational needs are fundamental to this process.

By employing these strategies, you can cultivate a culture where every employee feels valued, respected, and empowered to contribute their distinct perspectives and talents.

The Punchlist

Whether you have little time and money for DEI initiatives or a lot of both, there is something you can be doing today to make progress toward your DEI goals. Here are recommendations from Advisory Board members about things you can get started on today. Bolder font indicates those actions prioritized by greater numbers of advisory board members.

- Build out recruitment pipelines beyond higher education institutions.
- Assess and share internal employee movement (retention, promotion) by demographic data.
- Design transformative programs for business leaders (C-suite, leadership team) to build connections between business and social issues.
- Build and illustrate alignment between DEI values, behaviors, and aspiration and organizational OKRs/KPIs.
- Gain and amplify the voices of your diverse employees and customers to identify areas of strength and growth.
- Design programs for employees that are equally as robust as programs for clients, customers, and communities.
- Share results and learnings from 2020 DEI grantmaking commitments that add to the collective approach for social justice. Springboard into recommitting or strengthening commitments.
- Prepare for the 2024 U.S. presidential election with company policy on nonpartisan issues (voting) and expectations for ERGs' shared space.
- Reinforce company's commitment to DEI through the CEO/leaders in public spaces, highlighting how the company has improved through DEI commitments.
- Create awareness of how the 2024 U.S. elections might impact your business and ultimately the communities served, including employees.
- Understand stakeholders within the company's materiality matrix to gain insights into how a change in DEI commitment will have an impact on them.
- Create and allow for communities of practice for DEI practitioners and supporters to support one another.
- Empower ERGs to share stories both within and outside the organization.

- Audit DEI initiatives (recruitment programs, grantmaking, etc.) with cross-department group to mitigate risk, communicate purpose, and manage stakeholder expectations for external audiences.
- Audit DEI initiatives (recruitment programs, grantmaking, etc.) with cross-department group to assess for unintended consequences and bias.
- Encourage employee giving and volunteerism to grantees supported by your DEI grantmaking by sharing the organization's impact.
- Partner with the company's Public Affairs team on legislation to encourage DEI-related efforts.
- Find and create cohorts across organizations that can work within a specific systemic issue (racial equity, health justice, etc.) in the community.
- Refine the what/why/how of the DEI commitment and programs and create internal systems across departments to address communication needs.

EFFORT

References

- 1 Sidley Austin LLP. (2023, August 2). U.S. Supreme Court ends affirmative action in Higher Education: An overview and practical next steps for employers. Insights | Sidley Austin LLP. https://www.sidley.com/en/insights/newsup-dates/2023/08/us-supreme-court-ends-affirmative-action-in-higher-education--an-overview-and-practical-next-steps
- 2 Oyez. (n.d.). Regents of the University of California v. Bakke. https://www.oyez.org/cases/1979/76-811
- 3 Quimbee. (2018, April 6). Promoting diversity? It's Constitutional! (Grutter v. Bollinger). https://www.americanbar.org/groups/law_students/resources/on-demand/quimbee-grutter-v-bollinger/#:~:text=The%20issue%20was%20whether%20a,compelling%20interest%20in%20achieving%20diversity
- 4 Chiwaya, N., & Souli, S. (2023, July 7). Where anti-'woke' efforts to ban DEI in higher education are happening. NBC News. https://www.nbcnews.com/data-graphics/anti-dei-bills-states-republican-lawmakers-map-rcna140756
- 5 U.S. Equal Employment Opportunity Commission. (2024, May). *EEO data collections*. https://www.eeoc.gov/data/eeo-data-collections#:~:text=The%20EEO%2D1%20Component%201%20report%20is%20a%20mandatory%20 annual,race%20or%20ethnicity%2C%20to%20the
- 6 JUST Capital. (2023, March). *Companies disclosing their EEO-1 reports saw higher 2022 returns.* https://justcapital.com/news/companies-disclosing-their-eeo-1-reports-saw-higher-2022-returns/
- 7 JUST Capital. (2023, March). Companies disclosing their EEO-1 reports saw higher 2022 returns. https://justcapital.com/news/companies-disclosing-their-eeo-1-reports-saw-higher-2022-returns/
- 8 U.S. Equal Employment Opportunity Commission. (2023, June 29). Statement by EEOC Chair Charlotte A. Burrows on Supreme Court ruling on college affirmative action. https://www.eeoc.gov/newsroom/statement-eeoc-chair-charlotte-burrows-supreme-court-ruling-college-affirmative-action
 U.S. Bureau of Labor Statistics. (2024, March). Women's earnings were 83.6 percent of men's in 2023. https://www.
 - U.S. Bureau of Labor Statistics. (2024, March). Women's earnings were 83.6 percent of men's in 2023. https://www.bls.gov/opub/ted/2024/womens-earnings-were-83-6-percent-of-mens-in-2023.htm
- 10 Boston College Center for Corporate Citizenship. (2020). Profile of the Professionals Study 2020.
- 11 Patten, E. (2016, July 1). *Racial, gender wage gaps persist in U.S. despite some progress*. Pew Research Center. https://www.pewresearch.org/fact-tank/2016/07/01/racialgender-wage-gaps-persist-in-u-s-despite-some-progress/
- 12 Chamberlain, A. (2016, March). *Demystifying the gender pay gap: evidence from Glassdoor salary data*. Glassdoor. https://www.glassdoor.com/research/app/uploads/sites/2/2016/03/Glassdoor-Gender-Pay-Gap-Study-3.pdf
- 13 The Equality Act 2010. (2017, April). The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

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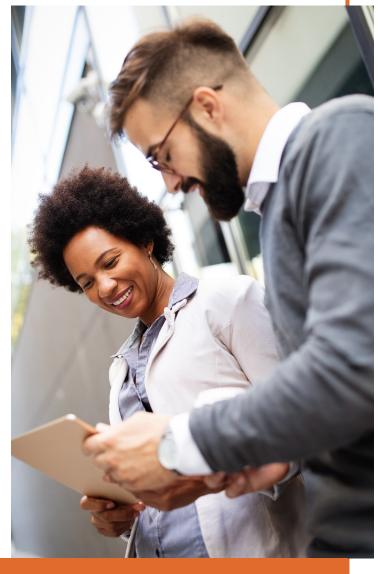
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