Chapter 14 Care as a Corporate Virtue

Maureen Sander-Staudt

Introduction

Bill Gates has called for more philanthropic capitalism, noting that although there are strong mechanisms for the generation of profit in capitalism, there are few incentives to meet the basic needs of others when doing so does not seem financially profitable (Gates 2009). What is needed, according to Gates, are caring individuals to use capitalism creatively to generate broad social welfare in profitable ways. In this paper, I use a feminist care ethic to expand on Gate's suggestion in a specific way, arguing for care to be understood as a corporate virtue, or a morally admirable trait conducive to individual and social flourishing, that inclines business agents to care-about and for others. More precisely, I argue that virtuously caring corporations should support the care responsibilities of their employees, especially women, and care broadly about the welfare of those vulnerable to their policies. In the first section I explain why understanding care as a corporate virtue is justified. In the second section I explore the conceptual aspects of care as a corporate virtue and give some examples of caring corporate policies. Finally, I outline the scope of care as a corporate virtue, defend against the charge that this proposal is unjust to corporations, and explain how such a virtue might be motivationally implemented.

Grounding Care as a Corporate Virtue

It is estimated that in the United States over 65.7 million people identify as caregivers, and that most of these are working women who experience stress relating to the difficulties of balancing care and paid work (National Alliance for Care-Giving and AARP 2009). Here I configure care as a corporate virtue in order to reduce the difficulties of balancing the responsibilities of work and care, with special attention to the unequal and non-reciprocal balance of care work for women.

 $M. \ Sander-Staudt \ (\boxtimes)$

Arizona State University, Phoenix, AZ, USA e-mail: maureen.sander-staudt@asu.edu

Although virtue ethics, feminist ethics, care ethics, and business ethics are distinct fields that are sometimes problematically aligned or conflated, their collaboration suggests that care could fruitfully be understood as a corporate virtue (Sander-Staudt 2006; Borgerson 2007). According to Aristotle, a virtue is an actively expressed trait of excellence, beneficial both to possessor and others, which habitually hits a mean between excess and deficiency. A care ethic informed by feminism offers two justifications for construing care as a corporate virtue in this sense, one derived from the gender neutral ideal of caring for the basic needs of all and one from a gender sensitive ideal of justice. As Gloria Albrecht puts it, two specific values must be held together: the health and well being of families, and the full social equality of women (Albrecht 2002). To develop the first justification I draw from Daniel Engster's principle of consistent dependency, and for the second I build on Lisa Tessman's description of burdened virtue (Engster 2007; Tessman 2005). Both accounts justify construing care as a corporate virtue that predisposes corporate leaders to support the caring responsibilities of employees, but are different in terms of favoring gender-neutral or gender-sensitive approaches to this goal.

The Principle of Consistent Dependency as Justification for Understanding Care as a Corporate Virtue

The first reason why care should be understood as a corporate virtue emerges from the principle of consistent dependency (PCD) articulated and defended by Daniel Engster. For Engster, individuals have an obligation to provide care and develop caring virtues, because we are (and have been and will be) dependent upon others. Engester's PCD stipulates that because all human beings depend and implicitly call upon the care of others for survival, development, and basic functioning, we should consistently recognize that others should receive care from us when they need it, and when we are able to provide it without significant sacrifice to ourselves. This is a logical principle in that one cannot consistently recognize one's own need for care without implicating oneself in providing care for others in need. As Sarah Clark Miller argues, electing a general policy whereby one avoids the burden of helping others in need by agreeing never to have one's own needs met is inconsistent and ruinous (Miller 2005). For Engster, this obligation is gradated, extending first to oneself, then to those closest in special relations, then to unknown others in close proximity, and finally to all others.

Engster primarily focuses on the obligation of governments to create caring economic conditions, but in many societies this responsibility also falls to businesses because they shape the structure of economic conditions (if not more so) than governments. Businesses depend upon workers to "care for" the corporation by contributing their labor and directing a good will toward the larger interests of their employer. They depend upon managers, employees and consumers to "careabout" the corporation in the form of being willing to engage in fair trade and not

despoil the company. Increasingly, financial institutions in the United States are sustained by tax breaks and government subsidies that draw from social resources. Firms are thereby obliged by the PCD to provide caring provisions for the basic needs of workers and worker's dependents, and to care about others they affect, such as stakeholders and consumers. As Mona Harrington states: "The reigning idea that the sole corporate responsibility is to create value for shareholders must be replaced by one that expands corporate obligation to include social health, and that means an obligation to support families and care" (Harrington 1999). Establishing care as a corporate virtue via the PCD is bolstered by the care ethical notion of reciprocity based on mutual interdependency. This notion of reciprocity does not construe moral obligations as existing only between those precise individuals who have cared for one another, but between the larger spatial and temporal networks of caring relations (Kittay 1998). As global markets decline with disastrous results for workers and their dependents, this concept is increasingly salient. As current economic failings render interdependence more visible, it is plausible to posit that both individuals and corporations benefit when corporations care, and suffer when they do not. Thus, to the extent that businesses depend upon care but refuse to acknowledge or support caring practices, they fail to exhibit moral character.

Although some business leaders might object that they benefit only from past care work that created its current workers, but not care work that produces future workers, this argument fails to appreciate how caring relations are intergenerational and nested, such that caring for past and current workers entails caring for future and developing others. It may appear that most individuals receive care from a discrete set of particular persons, but acts of care are in reality facilitated by networks of care. Parents are able to care for their children only because someone cared for them, under complex historical social conditions that provided at least some minimal standards for the continuation of life, which today typically includes the provision of income. The care of current workers is thus intertwined with the care of past and future workers, because most workers have caring obligations and ties to such persons (Social Security is one such example.) Corporations are implicated in caring reciprocity as providers of income and controllers of the conditions under which some of these caring needs are now met. Corporations likewise depend upon networks of care, and could not function without basic social provisions for the maintenance of life, and shared conceptions about what counts as money and fair trade. Corporations reap the benefits of social arrangements that provide care for free or little pay, simultaneously tapping the profit potential of caring services without recognizing or reciprocating care to those within the scope of their power who give this care.

As such, Engster's political philosophy of care supports understanding care as a corporate virtue for gender-neutral reasons relating to basic need. To the extent

¹The distinction between caring-for and caring-about was first made by Nel Noddings, who posited it as the difference between hands-on applications of care which are face to face with a care recipient, and a state of feeling a concern about something, planning or providing something, or having an idea that supports direct care.

that the basic needs of employees and their embedded relations are linked to the current organizational structures of corporations, Engster's analysis supports the idea that care is a virtue that corporations should reciprocate. Such a virtue does not dictate that employers must always exhibit a caring disposition toward employees (although this is generally recommended), but it does endorse attentiveness and responsiveness to the various needs of employees, concern for employees' dependents, and the implementation of policies and benefit packages in support of care work. However, Engster's political philosophy is self-described as minimally feminist, concerned with meeting the basic needs of women and children as humans. While this approach grounds care as a corporate virtue instrumental to the ability of many individuals to meet the needs of themselves and others, it lacks contextual specificity. It does little to reconfigure unequal distributions of caring burdens beyond those that contribute to neglect, and requires no serious revision of gendered hierarchical power differentials that characterize current care delivery systems, providing that they meet the basic needs of all within the effective management scope of a corporation.

Feminist Justifications for Understanding Care as a Corporate Virtue

Alternatively, a care ethic that is more explicitly feminist broadens Engster's notion of basic need to include the goal of achieving justice and parity for women caregivers, such that might emerge from Lisa Tessman's analysis of burdened virtues. Tessman explains that oppression causes moral damage to subordinated peoples in the form of "burdened virtues" (Tessman 2001, 2005). Based on Aristotle's insight that individual virtue is compromised by social injustice, Tessman argues that the oppressed are prevented from living the best possible lives. She notes that although Aristotle recognized the need of external goods for flourishing, he was short-sighted in considering the inability to access these goods as the result of accidental and natural qualities, rather than of relations of oppression. Indeed, he endorsed a political system within which many humans, including women care-givers, were excluded from the opportunity to flourish. Tessman traces how oppression causes "moral damage" that justifies the continued maltreatment of the oppressed. She states that care qualifies as a burdened virtue for women in these ways, but her claim warrants further explication (Tessman 2005).

There are three ways in which care could be said to be a burdened virtue for employed women care-givers. First, the virtues associated with care and the corporate workplace conflict in ways that prejudicially reflect poorly on their characters. Elizabeth Anderson identifies two ideologies that impugn the virtue of this group—the andocentric model of work, and a work ethic that defines a "general reciprocity principle" only in terms of paid work (Anderson 2004). The andocentric model of work is based on the traits of an "autonomous man", and pressures employees not to have care-giving responsibilities. Coupled with a "general reciprocity principle" that

requires able bodied citizens to assume their fair share of social burdens, but only counts work that commands a market price, the andocentric model of work turns dependency into a vice. Care-givers are encouraged to work for a wage in order to avoid the stigma of being perceived as lacking in personal responsibility and are given few other options. At the same time that employed women are expected to adopt the traits of "autonomous man" at their jobs, they are pressured to be devoted mothers, partners, and housekeepers at home. Much of this first burden is due to scarce social concessions for the practice of care-giving, combined with the continued reality that women are held more responsible for direct forms of hands-on "caring-for" than most men, whose responsibilities more typically include indirect forms of "caring-about" (Meyers and Durfee 2006; Allard and Janes 2008).

Moreover, as Eva Feder Kittay notes, the demands of familial dependency work conflict with the demands of market based employment (Kittay 1998). Care-givers who work for an income struggle with competing schedules and intense demands on their time and attention, spurring some women care-givers to leave paid work if they are financially able (Waldfogel 1997; Rivers and Barnett 2000; Aloi 2005; Story 2005; Blades and Rowe-Finkbeiner 2006; Williams 2007). Those who stay in the paid work force may be faulted for being less competent as they strive to be good enough care-givers, while also being virtuous employees expected to behave as if they had no personal care responsibilities—a stressful condition that Judith Warner refers to as "this mess" (Warner 2005). When things predictably get neglected or go wrong at home, women care-givers may again be blamed. Forbes editor, Michael Noer, thus cautions men against marrying working women because "professional women are more likely to get divorced, more likely to cheat, less likely to have children and when they do have kids are more likely to be unhappy about it... You will be more likely to fall ill. Even your house will be dirtier" (Noer 2006). Rather than questioning these conflicting standards of virtue, or urging men and corporations to be more responsible for direct care, employed women care-givers are portrayed as vicious individuals with inherent character flaws.

The second way in which care is a burdened virtue for women in the U.S. is economically. A persistent motherhood related wage gap means that women caregivers suffer severe financial penalties within corporate America. Across a variety of fields, women with children are less likely to be promoted than men with children and childless women, even when they have comparable backgrounds and work hours (Crittenden 2001; Mason and Goulden 2004; Williams 2007). Motherhood is a key factor in pay differentials in that women without children make 90 cents to a man's

²Gender and sex plays out in workplace compensation in that there is more economic parity for women when they exhibit the masculine gender qualities of being (or appearing to be) unencumbered, or when they occupy "tough" male dominated fields. Women who gendered feminine in terms of hands-on "caring-for" dependent others are least likely to be financially compensated. At least one study shows this pattern to also be related to sex, however, holding for trans-gendered workers across sex-change transition. That is, men who change their sex to female, on average saw a pay decrease, while women who changed their sex to male, saw an average pay increase, on par with the larger wage gap. See Schilt and Wiswall (2008).

dollar, married mothers 73 cents, and single mothers 56–66 cents (Waldforgel 1997). Over the course of a lifetime, this gap costs the average full-time working mother between \$700,000 and \$2 million dollars (Rivers and Barnett 2000). Moreover, the U.S. is only one of six industrialized nations in the world that does not require a provision for paid maternity leave from employers and governments (Olson 1998). While the 1997 Family and Medical Leave Act (FMLA) requires larger corporations to offer 3 months of unpaid care-related leave to full-time employees at companies with over 50 employees, this provision offers no benefit to those who cannot afford unpaid leave, work part-time, or work at smaller businesses. Although child care benefits are provided for military and some federal workers, the bulk of child caregivers in the U.S. are expected to provide care themselves, or by self-arranged proxy. In 2006 only 7% of white collar occupations had access to on-site/off-site child care benefits, and only 2% of blue collar occupations did so (Sloan Work and Family Fact Sheet 2006). This policy suggests that for most workers, care-giving is thought compatible with the virtue of economic justice only if concessions are needed for a short time (3 months), and do not require financial support beyond the care-giver's sole means. Both expectations are unrealistic and unfair in today's world, given that the average period of care for care-givers is 4.6 years, and direct care-giving is correlated negatively with income.³

Finally, care is a burdened virtue because employed women care-givers risk becoming complicit in unjust care distributions when they depend upon others to meet their care responsibilities. As more workers pay others to provide care, the work of care is shifted down onto women more intersectionally disadvantaged, creating a caring economic distribution which Joan Tronto declares as frequently unjust (Tronto 2002). Those who provide care for pay face the same conflict of needing to meet their own care-giving responsibilities while earning a living, but are also typically further underprivileged in terms of race, class, age, and/or citizenship status (DiQuinzio 1993; Tronto 1994; Hondagneu-Sotelo and Avila 1997; Duffy 2005; Weir 2005; Mullin 2005). Dan Jacoby notes that keeping the cost of care-giving manageable for working class families divides the interests of women along race and class lines, as care workers are recruited from former welfare recipients, the lower class, and immigrant populations (Jacoby 2006). Factors such as age and kinship also figure into this distribution, as it is common for older women and/or female relatives to care *pro bono* so that other family members may earn a wage.

³Social Security is another work related policy in the U.S. that links care entitlements to paid work, implying that care-givers are deficient in the virtue of justice if they have not reciprocated the function of paid worker. It makes no provision for care-givers working outside of the paid work force, apart from reduced entitlements nested in marriage benefits, which single care-givers and homosexuals cannot obtain. Feminist economists Anne Crittenden and Nancy Folbre explain how the economic value of care is rendered invisible in the Social Security system, making motherhood related exclusion from paid work the leading cause of poverty for elderly women (Crittenden 2001, 77–78; Folbre 2001, 97–99).

A feminist care ethic posits the need for gender as well as sex equality in the corporate workplace that traces responsibility for "caring-for." The feminist call for men to share in the work of care has not eradicated these burdens, merely shifted them slightly. Both men and women responsible for caring-giving experience certain disadvantages associated with doing work perceived as more feminine, in comparison to men and women who adopt more masculine dispositions or professions. However, although men are not immune to discrimination as care-givers, women care-givers are often judged as less professionally competent than their male counter-parts because of the stronger negative connotations of care accruing to female sex and gender roles. One recent study found that actual employers are more likely to disfavor job applicants identified as mothers than fathers on a host of measures, including perceived competence and recommended starting salary, even when otherwise identical credentials are submitted (Correl et al. 2007). The study not only found that fathers suffered no equivalent hiring penalties, they sometimes benefited from their parental status. A caring corporation should thus implement policies capable of tracking care-related sex and gender disparities in the workplace. Corporate gender neutral policies such as the FMLA rightly construe care as the work of both men and women, but ignore social biases and physical differences that saddle women with heavier care-giving burdens. A more adequately feminist construal of care as a corporate virtue recommends policies with flexibility to respond to the contextual caring needs of employees. Having now established the justificatory grounds for understanding care as a corporate virtue, I turn to some conceptual aspects of this proposal.

Care as a *Corporate* Virtue

Identifying care as a corporate virtue begs the question of whether it makes sense to talk of the virtues of collectives. Aristotle's virtue ethic affirms the idea that virtues are both traits of individuals and collectives.

one citizen differs from another, but the salvation of the community is the common business of them all... If... the happy life is the life according to excellence lived without impediment, and that excellence is a mean, then the life which is in a mean, and in a mean attainable by everyone, must be the best. And the same principles of excellence and badness are characteristic of cities and constitutions. (1254b25; 1276b30; 1295a35)

Here Aristotle attributes virtues and vices to civic collectives, but it is reasonable to suppose that they could also characterize other collectives such as corporations.

But what does it mean to suggest that care is a corporate virtue when most corporations are collectives comprised of individuals with diverse dispositions and powers? It is not clear that virtue and vices can be attributed as shared qualities, a point exemplified in the AIG scandal of 2009. In response to the public outrage that followed when corporate managers received millions of dollars in bonuses after having received a billion dollar subsidy from the U.S. federal government, many

AIG employees resisted accusations of corporate vice on grounds that these bonuses applied to only one division, and that the decision to award bonuses was beyond their control. Perhaps, then, corporations are the wrong sort of metaphysical entities to attribute virtue and vice because they lack certain necessary or reducible features, such as motives, rationality, appetite, happiness, or a need for moderation. If this critique is correct, a corporation cannot be virtuous or vicious because it is not a person, but a collection of persons with diverse dispositions and actions, with varying degrees of decisional power. It follows that we can only speak of the virtues and vices of corporations in a metaphorical or reductive sense.

While this critique indicates some of the difficulties with attributing virtues and vices to collectives, it does not succeed in rendering the idea of corporate virtue nonsensical. Some moral philosophers contend that a metaphorical use of vice and virtue terms is adequate for establishing corporate responsibilities (Moon, Crane, and Matten 2005). Others argue that collective virtues reduce to the idea that corporations are virtuous to the extent that at least some members are virtuous, especially those with governing powers. Yet others hold that corporations possess requisite features for having a distinct moral character in a more literal sense, such as motives and responsibilities (Wieland 2001). For example, Aditi Gowri argues that corporate virtues are derivable because firms have appetites for profit that are in need of moderation (Gowri 2006). Corporate virtues also can be derived from an implicit valuing of freedom or some other pervasive social good (like care). (Palmer 2007) Moreover, as Karl Schudt points out, corporations exhibit a rational calculation of means and ends, are treated as persons before the law, and in common speech are referred to as agents (Schudt 2000). They have vast stores of power, money and resources at their disposal to affect the lives of individuals, so to conclude that corporations lack moral agency, or have no moral obligations at all, as in "all's fair in business", is to put humans at the mercy of "corporate monsters" (Schudt 2000). As Robert Solomon concludes, "people in the corporation, individually and collectively, can and do care" (Solomon 1998).

Following from these arguments, corporate virtue ought to be understood as a habitual individual and collective property of excellence that refers to both disposition and practice. Jeanne Liedtka argues that in addition to being composed of individuals who are caring, a caring organization needs to actively support caring efforts through its goals, strategies, and values (Liedtka 1996). But in attributing care as a corporate collective virtue, it is important to track the varying degrees of power within businesses. A business might be characterized as caring, informally, if its low ranking employees care due to their own values and dispositions. But a feminist account of care as a corporate virtue suggests that a corporation is more formally or fully caring when those with governing power habitually exhibit the virtue of care through corporate policies and decisions in support of those with whom they relate. While a feminist ethic of care also recommends a reorganization of corporations away from power hierarchies toward more democratic and shared management styles, the stipulation that a corporation is caring to the extent that empowered executives care is needed to grapple with the reality that corporations

are rarely configured as power sharing democracies. Having established that collective virtues and vices are feasible, the substance of care as a corporate virtue can be further delineated by appeal to the sub-virtues of care.

Sub-Virtues of Care as a Corporate Virtue

In addition to the more general description of care as a corporate virtue given above, a care ethic provides a more detailed account of this virtue via three sub-virtues of care: attention, responsibility, and respect. That is, a caring corporation is one that is attentive to the needs of those within its moral scope, responsive to these needs in competent ways, and respectful of the dignity and rationality of care recipients. I will describe each of these sub-virtues in turn and some their corresponding vices as they might apply in a corporate setting.

Attention—This is the first phase of caring, in which possible care-givers notice the needs that they are in the best position to meet. Care ethicists characterize this sub-virtue as a quality of moral perception that evokes sensitivity to situations that call for moral response (Ruddick 1989; Tronto 1994; Held 2006; Engster 2007). Engster states that attentiveness is a capacity for noticing and anticipating needs, and directs us to ask the question: "What do you need?"

An attentive corporation does not view persons as interchangeable, but notices the caring needs of the particular people whom it employees and affects, acknowledging both general and extenuating circumstances. It does not view employees as atomistic persons, but as persons embedded in chains of interdependency filled by individuals with varying needs and abilities. It is attentive to the different kinds of caring needs attributable to sex and gender, and attends to vulnerabilities created by other power differentials.

A corporation deficient in attention can be said to exhibit the vice of neglectful inattentiveness or selfish absorption, while one that is excessive may be said to exhibit the vice of smothering over-involvement. As an example of the former, Joan Tronto describes deficiencies of attention that take more particular and remote forms:

when a boss orders all the employees to arrive a half hour earlier tomorrow, knowing that some of the women who work for him have children who require care, we might suggest that such inattentiveness is worse than if this same individual does not understand the moral dimensions of cutting Medicaid benefits to working single parents, [as this is an] inattentiveness that is more remote. (Tronto 1994)

Tronto counts both forms of inattention as vice, and finds that ignorance of caring need is built into social structures of capitalist economies. The role of corporations is linked to an increased insensitivity to caring need not only because in modern markets virtually all human needs can be met for a price, but also because "privileged irresponsibility" for care work is a reward and signifier of economic success, and caring needs typically are scrutinized by businesses only when profitable. On

the flip side, the latter vice is one of excess, in that a corporation that is overly attentive to the needs of employees and others may be characterized as paternalistic. It may meddle in its employee's lives without good reason, at the wrong time, or with no purpose that serves the ones being scrutinized. The third virtue of respect thus serves as an important check on this vice.

Responsiveness—The second virtue of caring is responsiveness, or moving to meet a need, and monitoring our care so we may be certain that others are getting the care they actually need according to their own judgment. According to Engster, the virtue of responsiveness directs care-givers to ask the question "What do you need?" (Engster 2007).

This virtue governs the phase of care that involves taking care of, and requires concrete actions in recognition that care is a practice that must be done (Held 2006). Responsiveness emphasizes the importance of successfully meeting needs, beyond mere good intentions to do so, and encompasses what other care ethicists call "completion", or "competence." It requires that a corporation take positive action to meet caring needs, and be competent in doing so, as assessed by the intended recipients (Noddings 1984). As Daryl Koehn explains in this volume (Chapter 8), a virtuously responsive corporation shows competence in avoiding unintended consequences as it seeks to mitigate corporate imposed burdens on caring practice. Tronto notes that obligation for responsiveness may arise because of something we did or did not do that has contributed to the need for care, or because we simply recognize a need for caring and there is no other way that the need will be met except for by our meeting it (Tronto 1994). In most cases corporations are responsible for caring about employers and dependents in the latter sense, because businesses exclusively are able to meet some care needs for their employers, such as providing a stable income, or flexible work schedules. In some cases, however, corporations may also be responsible for care in the former sense, such as when an employee is injured on the job, an employee's family is rendered homeless because of a sudden layoff due to executive mismanagement, or a consumer is injured by a faulty product.

Again, the vices constituted by a deficiency of response in the corporate world are much more widely evident than the vices of excess. While some corporate leaders overtly ignore care-giving needs, many more recognize the value of *appearing* to be responsive, but secretly pursing their own selfish and narrow interests. Like the former CEO of General Motors, Roger Smith, as depicted in Michael Moore's documentary, *Roger & Me*, corporate leaders may strive to remain inattentive in order to dodge responsibility, even when giving lip service to the virtues of corporate care. Others may have good intentions, but fail to be fully competent in their response to care-givers as assessed by intended recipients. As Albrecht explains, so called "family friendly" corporate policies, such as the FMLA, typically fail to respond to the *real* needs of families in terms of their effectiveness (original emphasis, Albrecht

⁴In one particularly poignant scene of *Roger & Me*, Smith, the former CEO of GM, quotes *The Christmas Carol* at a Christmas Eve pageant, espousing the virtue of care and love of humanity, paying no attention to the fact that many laid-off GM workers had been evicted from their homes just earlier that day.

2002). Likewise, Joanne Martin describes how even well intentioned companies seeking to help women with children often merely suppress gender conflict without alleviating gender inequalities (Martin 1990). Building from a virtue epistemology based on role models, corporations aspiring to care should turn to exemplars of corporate care on both the national *and* international level, and habituate themselves in ways of delivering just care locally and globally (Robinson 1999; Anderson 2003; Landsburg 2006; Weir 2005).

Although responsiveness is difficult to precisely delineate absent contextual knowledge of a corporation and its relations, a standard policy recommended by care ethicists is a paid and extended FMLA policy, which is transparent, easily accessible, and available to all workers. This leave could be funded by governments as well as corporations, but minimally requires corporate accommodation. It is also important to tailor the FMLA so it allows flexible response to the specific needs dictated by embodied and social particularities, such as those relating to sex and gender.

Fineman thus speaks against social policies that presume gender neutrality in order to create gender neutrality, because they ignore how caring-for is associated with responsible motherhood, and how pregnancy and lactation are biologically linked to women (Fineman 1995). A more flexible and attentive FMLA might offer pregnant women extended paid leaves, or reduced loads, out of recognition of the unique physical relationship between mothers and young children. Such leaves should extend beyond the first weeks of infancy, in recognition that caring needs evolve but persist as a child grows. However, in recognition that men are less likely to take or be granted leave for care responsibilities, a revised FMLA might offer men, and other secondary partners, a "use or lose" paid leave. This policy should likewise remain sensitive to other social factors that delineate caring benefits and burdens, including class, sexual orientation, ability, and race, in a way that seeks to mitigate dependency based workplace discrimination.

Caring corporate policies include a livable wage and health care provision, but also temporal and spatial organization of labor so that productive work does not unduly interfere with an individual's ability to care for self or dependents (Engster 2007). Care-giving employees require workplace and workday flexibility, as well as affordable, accessible, and just forms of delegated care (Bakst and Taubman 2008; Bakst 2010). Work weeks need to be reasonably limited to provide time for domestic work and leisure activity. Further suggestions might include work schedules compatible with school/social schedules, on-site care or referral services, paid sick leaves, elder care resources, and paid vacation time. Kittay recommends a social provision for *doulas*, or professionals who care for care-givers, and corporations should provide this service both by developing it as industry, but also by including it as an employee benefit (Kittay 1998). Finally, there should be strong reluctance to lay off workers, especially without notice or contingency plans. When unavoidable, lay-offs should include provisions for health care, housing, severance packages or pensions, with contingencies for dependents (Bragues 2006; Engster 2007).

Respect—The third sub-virtue of care is respect, which Engster describes as recognition that others deserve our attention and response, are "capable of understanding and expressing their needs", and are not inferior because they have needs that cannot be met on their own (Engster 2007).

Applying this sub-virtue to corporations suggests a need for management styles that open up communication with all employees. It recommends moving away from bureaucratic, "top-down" styles of communication in favor of shared interchanges, moving toward an overall reorganization of corporate hierarchies (Sevenhuijsen 1998; Wieland 2001; Hankivsky 2004; Folbre 2006). Although Engster seems correct that a caring corporation need not be owned by workers, there is strong consensus that it would create a hearty capacity for workers to influence corporate governance in terms of what Nancy Frasier calls "a politics of needs interpretation" (Engster 2007; Frasier 1989). A respectful caring corporation listens carefully to those with whom it relates without arrogance, welcomes diverse styles of communication, and takes in rather than quashes differences of opinion (Borgerson 2007). It develops a corporate culture of empathetic concern that moves beyond rational self-interest.

Again, the vices of deficiency in the matter of respect seem more common than vices of excess, although one can imagine a company that engages in so much respectful communication that it thwarts the ability to make quick and definitive decisions. But most often, the risk is one of deficiency. The fact that the needs of care-givers in America are so woefully unsupported in comparison to other industrialized nations can be explained in part to a lack of corporate respect, reflected in communication gaps, miscommunications and disjointed perceptions about corporate responsibility for care. At least one study has uncovered vast disparities of perception between top management and employees with regard to eldercare, childcare, and care for substance abusers, with employees viewing corporations as partially responsible for meeting and supporting these needs, and executives viewing corporations as not at all responsible (Miller, Stead, Pereira 1991). Respect speaks to the importance of including employees and their dependents in needs assessment and response. Albrecht thus urges businesses to recognize employees as their best resource for identifying work/family conflicts and for generating possible solutions (Albrecht 2002).

These sub-virtues of care help to fill out the content of care as a corporate virtue. In the final section I address remaining questions about the appropriate scope of care as a corporate virtue, the fairness of assigning care responsibility to corporations, and the best way to implement the virtue of care in business.

The Scope, Fairness, and Implementation of Care as a Virtue of Corporations

Like a person, a corporation cannot care for everyone. A feminist care ethics understands corporate responsibility as having broad, but graduated extension, which begins first with those who are most proximately and seriously affected by a

company, and emanates out toward other relations. A corporate virtue of care tempered by an Aristotelian mean recommends a domain that is moderate, but more substantial than what currently exists in the United States. In recognition that most workers are employed in order to meet the needs of themselves and their families, a reasonable scope to the corporate virtue of care would have companies support workers' abilities to develop and maintain basic capabilities in the expanded feminist sense. Engster recommends that caring and commodity production be balanced, and that care theory remain flexible in defining the best means for delivering care, favoring experimentation and innovation. However, he concludes that contemporary societies would benefit from subordinating economic activity to the aims and virtues of caring. Liedtka further argues that corporate care is bounded by reach, self care, and the need to be competitive. Given these considerations, she posits that:

... the business organization, conceived of as a "community of mutual care," would have a responsibility to care for those in proximity to them who have needs that they are especially well-suited, by their capability base, to fulfill, where giving such care does not act against their own needs. (Liedtka 1996)

Within the circle of corporate care Liedtka includes employees, small town communities where corporations are located, and consumers who can be profitably served. She places competitors, larger cities, and potential customers who cannot pay within the realm of justice, although she makes an exception in cases where a company is uniquely suited to fill a need and can do so without harming itself.

Liedtka's account clarifies the scope of corporate care, but requires supplementation in at least three ways. First, this virtue should be understood as resisting corporate trade-offs between the needs of employees and paying consumers, evident in the practice of justifying low wages through the production and sale of cheap goods, recommending instead that there be certain livable minimal standards of care for all. Second, Liedtka's account is complicated by factors relating to the rise of big business on a global scale. Increasingly, multinational corporate conglomerates have numerous facilities around the world, blurring small and large town distinctions. What is today a competitor may tomorrow be a purchased subsidiary of a larger company, and potential customers who cannot pay may come from most needy populations.

In such cases we might turn to the principle recommended by Burton and Dunn, that corporations ought "care enough for the least advantaged stakeholders that they not be harmed; insofar as they are not harmed, privilege those stakeholders with whom you have a close relationship" (Burton and Dunn 1996). This principle moves in the right direction, but fails to track power, response-ability, and need as suggested by Tronto. A more positive and adequate version of this principle, then, demands special attention to the least advantaged members of the moral community, who are so disadvantaged because of corporate action or policy, or whose need is dire and are situated such that a corporation is proximately suited to meet their need.

Finally, Liedtka's account requires supplementation in that Fiona Robinson rightly points out that in the age of globalization, the corporate obligation to care for

the "proximate" extends beyond national borders (Robinson 1999). As corporations expand, relocate, and seek cheap labor in foreign markets, populations are created that are vulnerable precisely because they reside outside of the spheres of influence in which corporate executives reside, and who may be doubly invisible not only because they are dependent on workers distant from corporate headquarters, but also because they reside outside of the market as agents altogether.

It may be objected that care as a corporate virtue as I have construed it places an ill-fitted or undue burden on business, a view that could be supported by appeal to Aristotle. In *Politics* Aristotle finds animals, women, and slaves to be naturally inferior to free men because "with their bodies [they] minister to the needs of life", a belief that persists in business today in the sense that care is viewed as the menial work of subordinates. Most company executives construe the caring obligations of their workers as private matters of personal responsibility, and care as a corporate virtue is rarely understood in this precise, expanded sense. As a disposition, care is sometimes viewed not as a virtue at all within corporate contexts, but as a vice and liability due to the perceived tough and competitive nature of business (Solomon 1992; Van Wensveen 1995).

Such an objection emerges from the "shareholder responsibility" argument, famously articulated by Milton Friedman, who held that the primary and sole obligation of corporations is profitability owed to shareholders (Friedman 1962, 1970). Applying this argument, it would follow that the obligation of corporations to care should at most be limited to caring provisions that do not interfere with the ability to maximize profit. Because in many cases there seem to be grave conflicts between the goal of maximizing profit and corporate care provision, such provisions are said to be unjust. Proposed mandates requiring businesses to provide health care or paid family leaves are often resisted on the grounds that they are too expensive and place undue burdens on corporations, especially small businesses.

An advocate of corporate care can begin to refute these charges by pointing out that, first, care functions as a corporate virtue even within shareholder theory to the extent that care (or at least its appearance) is conducive to profitability, and second, that corporations often underestimate the profit making potential of actual care. That care is acknowledged as a perceived corporate virtue is evident in ascriptions of care functioning in marketing and public relations strategies. Most companies strive to appear as caring in order to establish a reputation as a "better business." This goal recognizes that corporate care is esteemed by the larger public because it is a trait associated with honesty, trustworthiness, fairness, and compassion. Even businesses with aims running counter to the goal of "caring for" basic needs (such as tobacco companies or home foreclosure specialists), acknowledge the benefit of "caring about" clients, consumers, and fiscal profitability. Corporations that provide care services, such as hospitals, day care centers, or hospices, explicitly feature "caring-about" and "caring-for" as part of their mission, as well as caring about good business relations more generally.

An advocate of care as a corporate virtue can further stress, moreover, that care is an actual, and not just a seeming virtue in regard to profitability, because caringabout the basic needs of employees and proximate dependents is conducive to a

company making money. In this manner, Julie A. Nelson contends that money, and even capitalist profit, are congruous with real caring motivations, because some activities done for money are motivated by the need to sustain life and its flourishing in material ways (Nelson 2006). Care provisions can yield profits by decreasing turnover, increasing productivity, and preventing unnecessary expenditures.

For example, although companies that allow workers to bring their babies to work report losses in short term productivity and focused work environments, they report long-term gains in employee loyalty, retention, and increased morale (Armour 2008). Paid family leave increases a chance of a woman returning to work after a child is born, decreasing the cost associated with employee replacement and retraining (Bakst and Taubman 2008). After implementing a back-up child care center, the company Bright Care reported that more than 68% of the 800 employees enrolled in the program would have missed work if not for it, saving 2,528 workdays, or the equivalent of 10 work years—a productivity savings of nearly \$400,000 (Sloan Work and Family Fact Sheet 2006). Additionally, a caring disposition in business can facilitate better working relations, as reported by Ilene Philipson, a clinical psychologist who treats workplace induced anxiety. She describes how many of her clients feel betrayed by employers who "don't care", or who characterize work relations as familial and caring but in practice neglect, alienate, or antagonize workers (Philipson 2002). Many of these workers seek employment elsewhere although they have not been fired, and their contributions are often missed. In these ways caring corporate dispositions and policies are compatible with profit in the form of employee satisfaction.

But if care is so profitable, why is it not already standard corporate practice? No doubt reluctance to develop care as a corporate virtue is due in part to how care has been viewed as a demeaning trait, but also because it has not been necessary to do so, thanks to the un(der)compensated labor of women and other service workers. Traditional sex based divisions of labor have yielded persistent andocentric models of employment, which encourage corporations to underestimate the profitability of care today.

However, a certain cost of caring-for must be acknowledged by a feminist care ethic seeking to mitigate this cost for women. A stronger response to the above objection that corporations ought to care not just because it is conducive to profit, but because it contributes to social flourishing that moves beyond monetary value. Accordingly, profit ought to be viewed as an important, but not exclusive goal in business. Fineman thus contends that "in the case of accommodation for caregivers, employers should not be permitted to evade their responsibility for some costs of dependency, even if it means some reduction in profits" (Fineman 1995). Liedtka maintains that a caring organization should be focused on persons, not quality or profits, and should undertake care as an end in itself, not as a means for quality or profit (Liedtka 1996).

This premise gains support from Aristotle's own virtue ethic. Although Aristotle did not endorse an egalitarian system of economic distribution, his esteem of the temperate mean precluded an insatiable drive for profit that must be cultured: "the

beginning of reform is not so much to equalize property as to train the nobler sorts of natures not to desire more" (1267b5). But how are such caring virtues to be cultured in corporate agents? Ideally, corporations would develop the virtue of care voluntarily. But whether corporations can be motivated to care simply because it is a virtue is questionable. They may need some coercive persuasion.

For this reason Engster sees governments as needing to regulate care responsibility in markets, meaning that care as a corporate virtue should be mandated to some extent, and also partially funded by governments. In addition to subsidizing care work, caring governments ought encourage care as a corporate virtue through incentives, and move away from a singular model of reactive litigation in compensation for corporate harm or neglect. As Roger King wryly observes, corporate powers may outstrip government powers (King 2001). But if state and global economic governing bodies regulate corporate care policies, making this virtue (like consumer safety) an expected formal standard for trade, there could be more assurance that corporations will care. However, taking Koehn's caution to heart, enforcing the corporate virtue of care through government sanction (such as penalizing companies for failing to conform to a FMLA policy) may have the unintended consequence of incentivizing businesses to avoid employing care-givers altogether. Thus, another tactic should be to educate and habituate business agents so that the virtue of care becomes part of their characters, and to increase the presence of care-givers in powerful corporate positions.

As Michael Slote notes, care is the motivational virtue that undergirds ethical concerns more generally (Slote 1998, 2007). Developing care as a basic motive in business agents, and empowering business agents already in possession of caring empathy can help move corporations beyond the basic goal of profit generation. That the shareholder responsibility argument is flawed in excusing corporations from any responsibility other than profit-making has already been well defended in business ethics, but not specifically with regards to the responsibility for just and adequate distributions of caring labor (Wieland 2001; Moore 2003; Corvino 2006). Similar contemporary arguments have been waged on behalf of other public goods, such as product safety and environmental health. Making such an argument on behalf of care requires showing that care provision is a supreme public good, and that corporations have unique and presiding functions in its delivery.

Conclusion

I have argued for understanding care as a corporate virtue defined as a habitual disposition and practice of individuals with corporate governing powers and reflected in corporate policies, characterized by the sub-virtues of care of attention, responsiveness, and respect. I have further argued that this virtue has a graduated scope, starting foremost with those most vulnerable to corporate policies, including employees, consumers, and community members, construed as particular others embedded in varying relations of dependency. Of course these basic suggestions are not meant to be a one-size-fits-all solution, but in accordance with care ethics and virtue ethics, must be applied contextually with practical wisdom. As corporations grow mightier in their global scope, with increasing power to determine the ability of individuals to care for themselves and others, corporations are becoming more immune to appeals of conscience. Yet, at the core of every corporation are individuals dependent upon collective efforts. It may be that through rising global market structures, inter-dependency will become more evident, and flourishing through mutual care can be facilitated by an expanded understanding of care as a corporate virtue.

References

- Albrecht, Gloria. 2002. Hitting home: Feminist ethics, women's work, and betrayal of family values. New York, NY: Continuum.
- Allard, Mary Dorinda, and Marianne Janes. 2008. Time use of working parents: A visual essay. *USA: Monthly Labor Review:* 3–14.
- Aloi, Daniel. 2005. Mothers face disadvantages in getting hired, Cornell study says. *Cornell News Service*4 August.
- Anderson, Gordon. 2003. Should America be France? CNNMoney.com, 6 October, www.money. conn.com/2003/10/06/pf/workless Aristotle. The Politics. J. Barnes (trans.) The Complete Works of Aristotle. Princeton, NJ: Princeton University Press, 1984.
- Anderson, Elizabeth. 2004. Welfare, work requirements, and dependent care. *Journal of Applied Philosophy* 21 (3): 243–256.
- Armour, Stephanie. 2008. Day-care's new frontier: Your baby at your desk. USA Today: 3-30.
- Bakst, Dina. 2010. Testimony before the NYC council women's issues. June 16 2010. Accessed 3
 June 2011. http://www.abetterbalance.org/web/images/stories/Documents/fairness/testimony/
 cc-testimony_dbakst.pdf
- Bakst, Dina, and Phoebe Taubman. 2008. Testimony before the NYC council women's issues committee. *The Work and Family Legal Center* 7 April: 1–7.
- Blades, Joan, and Kristin Rowe-Finkbeiner. 2006. *The motherhood manifesto: What America's moms want and what to do about it.* New York, NY: Nation Books.
- Borgerson, Janet L. 2007. On the harmony of feminist ethics and business ethics. *Business and Society Review* 112 (4): 477–509.
- Bragues, George. 2006. Seeking the good life: The Aristotelian approach to business ethics. *Journal of Business Ethics* 67: 341–357.
- Burton, Brian, and Craig Dunn. 1996. Feminist ethics as a moral grounding for stakeholder theory. *Business Ethics Quarterly* 6 (April): 133–147.
- Correl, S., S. Benard, and I. Paik. 2007. Getting a Job: Is there a motherhood penalty? *American Journal of Sociology* 112 (5): 1297–1338.
- Corvino, John. 2006. Reframing the morality pays argument: Toward a better answer to 'Why be moral' in business. *Journal of Business Ethics* 67 (1): 1–14.
- Crittenden, Ann. 2001. The price of motherhood: Why the most important job in the world is still the least valued. New York, NY: Owl Books.
- DiQuinzio, Patrice. 1993. Exclusion and essentialism in feminist theory: The problem of mothering. *Hypatia* 8 (3): 1–20.
- Duffy, Mignon 2005. Reproducing labor inequalities: Challenges for feminists conceptualizing care at the intersections of gender, race and class. *Gender and Society* 19 (1): 66–82.
- Engster, Daniel. 2007. The heart of justice. New York, NY: Oxford University Press.
- Fineman, Martha. 1995. The neutered mother, the sexual family and other twentieth century tragedies. New York, NY: Routledge.
- Folbre, Nancy. 2001. The invisible heart: Economics and family values. New York, NY: The New Press.

Folbre, Nancy. 2006. Demanding quality: worker/consumer coalitions and high-road strategies in the care sector. *Politics and Society* 34 (1): 1–21.

- Frasier, Nancy. 1989. *Unruly practices: Power, discourse and gender in contemporary social theory*. Minneapolis, MN: University of Minneapolis Press.
- Friedman, Milton. 1962. Capitalism and freedom. Chicago, IL: University of Chicago Press.
- Friedman, Milton. 1970. The social responsibility of business is to increase its profits. *New York Times Magazine*: 13 September.
- Gates, Bill. 2008. Making capitalism more creative. Time.com. 31 July. http://www.time.com/time/business/article/0,8599,1828069-2,00.html. Retrieved 11 June 2009.
- Gowri, Aditi. 2006. On corporate virtue. Journal of Business Ethics 70 (1): 399-400.
- Hankivsky, Olena. 2004. Social policy and the ethic of care. Vancouver, BC, Canada: University of British Columbia Press.
- Harrington, Mona. 1999. Care and equality: Inventing a new family politics. New York, NY: Routledge.
- Held, Virginia. 2006. *The ethics of care: Personal, political, and global*. New York, NY: Oxford University Press.
- Hondagneu-Sotelo, Pierette, and Ernestine Avila. October 1997. I'm here, but I'm there: The meanings of Latina transnational motherhood. *Gender and Society* 11 (5): 548–571.
- Jacoby, Dan. 2006. Caring about caring labor: An introduction. Politics and Society 34 (1): 5-9.
- King, Roger J.H. 2001. "Virtue and community in business ethics: A critical assessment of Solomon's Aristotelian approach to social responsibility. *Journal of Social Philosophy* 32 (4): 487–499.
- Kittay, Eva Feder. 1998. Love's labor: Essays on women, equality, and dependency. New York, NY: Routledge.
- Landsburg, Steven. 2006. Why Europeans work less than Americans. Forbes.com. www.forbes. com/2006/05/20_steven_landsburg_labor
- Liedtka, Jeanne. 1996. Feminist morality and competitive reality: A place for an ethic of care. *Business Ethics Quarterly* 6 (April): 179–200.
- Martin, Joanne. 1990. Deconstructing organizational taboos: The suppression of gender conflict in organizations. *Organization Science* 1 (4): 339–359.
- Mason, Mary Ann, and Marc Goulden. 2004. Do babies matter (Part II): Closing the baby gap. *Acadame* November–December: 11–16.
- Meyers, Marcia K., and Alesha Durfee. 2006. Who pays? The visible and invisible costs of childcare. *Politics and Society* 34 (1): 109–128.
- Miller, Sarah Clark. 2005. A Kantian ethic of care? In *Feminist Interventions in Ethics and Politics*, ed. Barbara S. Andrew, Jean Keller, and Lisa H.Swartzman. New York, NY: Rowman and Littlefield.
- Miller, J., B. Stead, and A. Pereira. 1991. Dependent care and the workplace: An analysis of management and employee perceptions. *Journal of Business Ethics* 10: 863–869
- Moon, Jeremy, Andrew Crane, and Dirk Matten. 2005. Can corporations be citizens?: Corporate citizenship as a metaphor for business participation in society. *Business Ethics Quarterly* 15 (3): 429–453.
- Moore, Geoff. 2003. Hives and horseshoes: What future for corporate responsibility? *Business Ethics: A European Review* 12 (1): 41–52.
- Mullin, Amy. 2005. Reconceiving pregnancy and childcare: Ethics, experience and reproductive labor. New York, NY: Cambridge University Press.
- National Alliance for Care-Giving and AARP. 2009. "Care-Giving in the U.S., 2009", http://assets.aarp.org/rgcenter/il/caregiving_09_fr.pdf, retrieved 1-25-10
- Nelson, Julie A. 2006. Can we talk? Feminist economists in dialogue with social theorists. *Signs: Journal of Women in Culture and Society* 31 (4): 1051–1074.
- Noddings, Nel. 1984. *Caring: A feminine approach to ethics and moral education*. Berkeley, CA: University of CA Press.

Noer, Michael. 2006. Don't marry career women. Forbes.com. 22 August. http://www.forbes.com/2006/08/23/Marriage-Careers-Divorce_cx_mn_land.html

Olson, Elizabeth. 1998. U.N. surveys paid leave for mothers. New York Times February: 16.

Palmer, Eric. 2007. Corporate responsibility and freedom. In *Controversies in International Corporate Responsibility*, ed. John Hooker, John F. Hulpke, and Peter Madson. Charlottesville, VA: Philosophy Documentation Center.

Philipson, Ilene. 2002. Married to the job: Why we live to work and what we can do about it. New York, NY: The Free Press.

Rivers, Caryl and Barnett, Rosalind Chaitt. 2000. Wage gap for working mothers may cost billions. Women's enews. 7 July. www.womensnews.org/article.cfm/dyn/aid/161/context/archive

Robinson, Fiona. 1999. Globalizing care: Ethics, feminist theory, and international relations. Boulder, CO: Westview Press.

Ruddick, Sara. 1989. *Maternal thinking: Toward a politics of peace*. New York, NY: Ballantine Books.

Sander-Staudt, Maureen. 2006. The unhappy marriage of care ethics and virtue ethics. *Hypatia* 21 (4): 21–40.

Schilt, Kristen, and Mathew Wiswall. 2008. Before and after: Gender transitions, human capital, and workplace experiences. 9 November 2008. Accessed 27 January 2010. http://www.bepress.com/bejeap/vol8/iss1/art39

Schudt, Karl. 2000. Taming the corporate monster: An Aristotelian approach to corporate virtue. *Business Ethics Quarterly* 10 (3): 711–723.

Sevenhuijsen, Selma. 1998. Citizenship and the ethics of care: Feminist considerations on justice, morality, and practice. New York, NY: Routledge.

Sloan work and family research network fact sheet. 2006. Q & A about gender and use of workplace policies; Q & A about employer-supported childcare. www.bc.edu/wfnetwork.

Slote, Michael. 1998. Caring in the balance. In *Norms and values: Essays on the work of Virginia Held*, ed. Joram Haber and Mark S. Halfon. New York, NY: Rowman & Littlefield Publishers. Slote, Michael. 2007. *The ethics of care and empathy*. New York, NY: Routledge.

Solomon, Robert. 1992. Ethics and excellence: Cooperation and integrity in business.: New York,

NY: Oxford University Press.

Solomon, Robert. 1998. The Moral Psychology of Business: Care and compassion in the corporation. *Business Ethics Quarterly* 8 (3): 515–533.

Story, Louise. 2005. Many women at elite colleges set career path to motherhood. *The New York Times* September 20.

Tessman, Lisa. 2001. Critical virtue ethics: Understanding oppression as morally damaging. In *Feminists doing ethics, Rowman & Littlefield Publishers: Boulde*, ed. Peggy DesAutels, and Joanne Waugh Boulder, CO: Rowman & Littlefield Publishers.

Tessman, Lisa. 2005. Burdened virtues: Virtue ethics for liberatory struggles. New York, NY: Oxford University Press.

Tronto, Joan. 1994. *Moral boundaries: A political argument for the ethic of care*. New York, NY: Routledge.

Tronto, Joan. 2002. The nanny question in feminism. Hypatia 17 (2): 34-51.

Van Wensveen, Louke M. 1995. Is toughness a business virtue? *International Journal of Applied Philosophy* 9 (2): 15–25.

Waldfogel, Jane. 1997. The effects of children on women's wages. *American Sociological Review* 62 (2): 209–218.

Warner, Judith. 2005. Perfect madness: Motherhood in the age of anxiety. New York, NY: Riverhead Books.

Weir, Allison. 2005. The global universal care-giver: Imagining women's liberation in the new millennium. *Constellations* 12 (3): 308–330.

Wieland, Josef. 2001. The ethics of governance. Business Ethics Quarterly 11 (1): 73–87.

Williams, Joan. 2007. What is the hidden gender bias in academia? UC Hastings college of law: Worklife law. www.worklifelaw.org/genderbias_index.html