

Towering inclusivity: Elevating diversity at Tower 28 Beauty

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Overview

Tower 28 Beauty is a brand known for its inclusive and sensitive skin-friendly makeup and skincare products. Tower 28 is a woman of color-led company, founded in 2019 by Amy Liu, a woman of color of East Asian descent based in California. Liu struggled with eczema and sensitive skin throughout her life and struggled to find a beauty brand free of sensitizing irritants. Backed with over fifteen years of experience working as a beauty executive, Liu went on to develop a brand offering beauty and skincare products made with calm, nourishing ingredients.

Tower 28 is the only brand on the market to completely follow the National Eczema Association's ingredient guidelines to avoid known irritants and allergens for those with sensitive skin such as essential oils and synthetic fragrances. Their line of products includes items such as facial spray, serum, lip gloss, skin tint, blush, mascara, and more — all being hypo-allergenic, non-comedogenic, dermatologist tested, and gluten-free.

Tower 28's mission revolves around designing products made for all skin types and celebrates their commitment to a beauty industry that is more diverse and inclusive. In 2020 Liu founded Clean Beauty Summer School, a professional development program for Black, Indigenous, and other People of Color (BIPOC) owned small clean beauty businesses. The program aims to increase the representation of BIPOC-owned brands as BIPOC have been historically underserved by the clean category in the beauty industry.

Though Tower 28 is a woman-of-color (WOC) founded brand that values inclusivity, **there is still more they can do to improve and create a more inclusive experience for all customers** and there are specific actions Tower 28 can take to evolve their practices.

Equity gap

1. Tower 28's makeup line lacks a diverse range of shades and excludes groups such as African Americans and other BIPOC.
2. Tower 28's marketing campaigns and materials lack models representing various ethnicities, ages, genders, and abilities

Tower 28's makeup line has a limited shade range.

For example, the SunnyDays™ Tinted SPF 30 is available in only seventeen shades. Of the seventeen shades, only five shades are available in deeper colors and four in medium and warmer colors. The remaining SunnyDays™ shades are available in lighter colors. Other products include Tower 28's OneLiner Lip Liner which is only available in three shades and the BeachPlease Cream Blush, available in nine shades.

A limited range of shades can exclude consumers with certain skin tones and undertones and fail to represent the diversity of skin tones across different ethnicities and racial groups. Skin tones and undertones can vary significantly and products in a limited range of shades may not complement or match all skin tones equally. For example, individuals can have varying shades of light, medium, and deep skin tones with undertones that could be cool, warm, or neutral. An individual with warm undertones may prefer makeup with peach undertones while an individual with cool undertones may prefer purple or mauve shades.

This limits Tower 28's appeal to a narrower demographic, excluding consumers who may feel underrepresented or excluded by the brand. The narrow range of shades and lack of representation can also further marginalize certain groups. For example, Black women have historically been excluded and alienated from the beauty community with a long history of beauty brands launching products that disproportionately cater to lighter skin tones. **This may damage Tower 28's brand reputation of being an inclusive brand, leading to a loss of trust among consumers.**

Tower 28's marketing campaigns and materials mostly feature models that are young, thin, able-bodied, cis-gendered women. Although Tower 28 features models of a diverse range of races, there is a clear lack of representation of other groups including people with disabilities, men and boys, older persons, non-binary and transgender persons, and people who are plus-size or full-size. **A lack of diversity in marketing can alienate consumers who do not see themselves represented in Tower 28's brand.**

Approach

1. Co-design: an inclusive and diverse shade range
2. Co-design: an inclusive marketing campaign

In both cases, we propose using co-design to collaborate with a diverse range of stakeholders, including consumers and experts, in the design process.

To challenge traditional gender stereotypes that makeup is exclusively for women and girls, we aim to include men, boys, and people with a diverse range of gender identities to co-design. We propose working with BIPOC makeup artists, experts, and community members to co-design, research, and develop a comprehensive range of shades that is inclusive and accessible to consumers of all skin tones.

To increase diversity in Tower 28's brand image, we aim to include diverse groups in our marketing campaign by including and co-designing with people who have been noticeably missing from previous campaigns. This includes people with disabilities, men

and boys, older persons, non-binary and transgender persons, and people who are plus-size or full-size.

Tower 28 has a goal and mission to create a beauty industry that is more diverse and inclusive. By using co-design, Tower 28 can leverage the expertise of stakeholders to create a makeup line and marketing campaign that reflects their values of inclusivity and accessibility.

Key features

Why does it take backlash for brands to have Inclusive Foundation Shades?

In a [LinkedIn article](#), Maude Okrah Hunter, a DEI consultant for beauty, media, and fashion and founder of Black Beauty Roster, discusses how more often than not, darker shades are an afterthought in the beauty industry and with it only being brought into the spotlight when there is public backlash. Hunter affirms that beauty brands launching with a limited shade range reinforce harmful messages that:

- Black women and other people of color are an afterthought
- The brand lacks commitment to inclusivity and representation
- The product development teams lack diversity, often resulting in incorrect undertones for darker skin tones

Hunter argues that beauty brands must be inclusive from the start and work with marginalized communities, makeup artists of color, and experts to invest time and resources in developing a comprehensive range of shades that cater to all skin tones.

Why diversity and inclusivity are key in the beauty industry

In a [Forbes article](#), Alison Bringé, Chief Marketing Officer at Launchmetrics, explains how diversity and inclusivity not only is a social responsibility, but a key business strategy that drives growth, innovation and brand loyalty in the beauty industry.

Bringé argues that **diverse representation in the products and marketing of beauty brands allows consumers to see themselves represented**. This allows companies to connect with a broader range of consumers.

A research brief from *CB Insights*, "[How The Inclusive Beauty Movement Is Redefining The Industry](#)" details the shift that the beauty industry has made due to working towards inclusive beauty. The brief includes the opportunities that making this shift has on new and established brands. It highlights all the points of including women of color, men, expanded shade ranges, gender-neutral branding and even making packaging more accessible to those with motor disabilities. It's a further testament to the changes the industry is heading towards and shows that Tower 28 can be at the forefront of change.

Embracing diversity and inclusion also drives market growth and innovation.

Historically Black women have been excluded from the beauty industry, struggling to find shades on the market that match their skin. By tapping into underrepresented and

excluded markets, brands can reach new markets and demographics, driving business growth.

For example in 2017, Fenty Beauty became the first cosmetic brand to launch a wide range of foundation tones with forty different shades. Bringé shared that Fenty Beauty's foundation line offering a diverse range of skin tones allowed a wider range of consumers to use the product, resulting in a total media impact value of \$96.2 million. Since its launch in 2017, Fenty Beauty's foundation line has gone on to expand to 58 colors.

Bringé also explained that **prioritizing diversity and inclusion principles can build brand loyalty and secure long-term success**. She shares that consumers increasingly care about brands that align with their values. "Brands that deliver on their values and contribute to society in an organic, authentic way often prove to be successful in reaching the consumer."

How does co-design lead to more equitable outcomes?

Francesco Petronelli, Associate Design Director at Frog Design, highlights the impact of co-design in achieving equitable company outcomes [in a blog post](#). Petronelli says that inclusive participation means involving diverse perspectives, particularly those of marginalized and underrepresented groups. This ensures more equitable outcomes because a broader range of voices is considered. Petronelli also discusses how co-design can demonstrate a brand's commitment to inclusivity and transparency, building customer trust and loyalty. "Instead of merely paying lip service to these ideas through public statements and performative marketing, co-design helps organizations create products and services that address real and diverse needs, improving experiences and outcomes for all," said Petronelli.

How Inclusive Design Became Big Business

[In a Fast Company article](#), Co.Design editor, Suzanne LaBarre explains how inclusive design has become a big business as a result of market demand, competitive advantages, and innovation within organizations. When it comes to **market demand**, LaBarre pointed out that a growing awareness of diversity and inclusion has driven a growth in consumer interest and demand for products and services that are accessible and inclusive. Inclusive design can also provide brands with a **competitive advantage** in the marketplace and **foster innovation** by pushing brands to consider the needs of diverse users.

An example LaBarre used is Nike's 2017 launch of the Pro Hijab, a hijab developed for athletic activities or physical exercise for Muslim women. The design went on to win Innovation by Design's top honors and revealed how inclusive design is smart business. LaBarre explained that modest fashion is now a \$277 billion industry and is expected to grow by \$311 billion by 2024.

Value proposition

Challenge: The current shade range and marketing do not fully represent the diverse spectrum of skin tones, ethnicities, ages, abilities, and identities across their customer base.

Proposed Solution: The marketing should be inclusive to show other skin tones, genders, ages, and abilities. Tower 28 needs to invest in expanding its product offering and marketing strategies to be more inclusive and diverse. For example, broadening the shade range (no industry average but the standard compares to Fenty's 58 range, currently Tower 28 is at 17), diversifying marketing visuals to include men and boys, diverse ethnicities, ages, abilities, gender identities, and the average customers. Partnering with honest and diverse influencers, preferably small creators.

Benefits: Increasing their market share with a wider audience, brand loyalty, positive brand image, improved marketing effectiveness, and attracting diverse teams and talent for the company.

By embracing inclusivity and diversity as core values, investing in a more representative product range and marketing strategy, can unlock significant growth potential, strengthen brand image, and create a more positive impact on the beauty industry and their customers.

Use case

Scenario: Jacob, a 25-year-old Latino with medium-brown, textured skin, with a prominent jawline and facial hair, loves makeup but struggles to find foundation shades that match his skin tone perfectly and feels excluded in beauty stores that mainly tailor towards light-skinned women's tone and branding. He often has to mix multiple shades or settle for colors that don't quite flatter his complexion and shops online because he feels more comfortable versus feeling excluded by shopping in-store from branding and products. This leaves him feeling frustrated and excluded from the beauty industry and brand.

Problem: Many beauty brands, including Tower 28, offer limited shade ranges that primarily cater to lighter skin tones or cool undertones, making it difficult to find a natural-looking match and a problem for men with deeper skin tones or warm undertones. Excluding people of color, and individuals with unique skin tones/types from finding products that work for them, leads to feeling frustration and alienation from not only the products but the brand itself. Especially with the feminine branding that most makeup brands use, for example, the aisles and packaging are often heavily geared towards women and girls, making it confusing for men and boys to navigate and identify products suitable for their needs.

Solution:

- Tower 28 expands its product shade range to include **20 new shades** specifically formulated for **deeper/warmer skin tones and undertones**.
 - Includes other makeup products with new hues that match darker undertones and aren't catered to lighter skin tones.
- Revamp their marketing to include a range of diverse individuals
 - The names of products seem fun but more "young and feminine". Examples: Lipie, Lip Jelly's, Beachplease, etc. It's important to know how people perceive gender and age within the branding, and tackle that to help widen the audience and reflect a more modern and diverse brand identity.
- Focus on the functionality and experiences versus color and stereotypically female color and style.
 - Different people talking about their eczema, why they prefer light coverage as a man/ or not, etc.
 - Focus on the experience black women have when it comes to finding their shade. Undertones play a key part in what makes a shade fit you. Having three dark shades that only match 25% of customers doesn't mean the colors are inclusive. The same goes for medium and light tones.

Result: Jacob easily finds a perfectly matched tinted SPF 30 SunnyDays shade that blends in seamlessly even with his texture. He feels confident knowing there are products designed to challenge the gender stereotypes around the makeup industry. This positive experience increases their brand loyalty and encourages him to try other Tower 28 products. Especially seeing men like him in their marketing and branding.

Competitive Edge/ Advantage

Increased Market Reach

Tapping into excluded demographics and those that are passionate about supporting/purchasing from inclusive and diverse brands, which are predominantly millennials and Generation Z. (Millennials currently hold the largest share of the beauty market, accounting for **38% of all beauty product purchases, while Gen Z accounts for 28%**)

Enhanced Brand Image and Reputation

- **Positive perception:** Demonstrating commitment to diversity and inclusion builds brand loyalty and trust, positioning you as a socially responsible and progressive company.
- **Stronger marketing potential:** Diverse representation in marketing campaigns creates positive word-of-mouth, attracts media attention and fuels organic reach through social media engagement.

Improved Product Development and Innovation

A deeper understanding of diverse needs: By actively engaging with diverse customers and listening to their feedback, brands can develop products that cater to different skin types, concerns, and preferences, leading to higher customer satisfaction and repeat purchases.

Market Differentiation

In a market where very few brands offer wide shade ranges, Tower 28 can position itself to be one of the most inclusive makeup companies, along with being the only certified makeup brand by the national eczema standards. Tower 28 can leverage this to its advantage and make itself more marketable by continuing to pioneer and reach “one-of-a-kind” milestones in beauty.

Timeline

Research and Development: (2 months)

1. Market Research to analyze diversity within the target audience and identify gaps in current product offerings.
2. Research competitor products and shade ranges for various skin tones and undertones.
3. Partner with DEI experts for guidance and feedback. (Internal)
4. Co-Designing will take place in this phase - the outreach and conduction.
5. Develop new shade ranges for existing product lines, ensuring inclusivity across various skin tones and undertones. While partnering with diverse makeup artists and consumers for product testing and feedback.
6. Finalize new shade ranges and packaging designs

Marketing & Campaign Planning: (2 months)

7. Develop a marketing campaign highlighting the new shade ranges with people of every different color, background, gender, race, and identity. “Embracing every hue”.
8. Identify partnerships with different small creators and develop content guidelines and best practices for marketing teams in inclusive language and imagery.
9. Finalize campaign, partnerships, social media strategy, scheduling for launch, and training.

Launch and Implementation: (1 month)

1. Launch new shade ranges and marketing campaigns across all channels, stores, and e-commerce.
2. Monitor campaign performances and engagement metrics while getting feedback from stakeholders and customers
3. Review and make adjustments if needed with social media strategy

Post Launch: (Less than 30 days)

1. Team meetings with stakeholders and departments to go over the metrics, wins and what could have been better, and future goals and implementations.

By providing a well-structured and realistic timeline, Tower 28 can demonstrate its commitment to diversifying its brand and its commitment to inclusivity, increasing the chances of our proposal's success.

Marketing Campaign

Our team is proposing an internal marketing campaign highlighting the importance of a key change in the product shade range and the representation in external marketing of Tower 28. Our inclusive campaign **“Embrace Every Hue”** is the relaunch of Tower 28's Sunny Day's SPF foundation and other makeup products to include 20 new shades and 10 new hues that will pair well with every skin tone and texture. The external campaign will include the new shade ranges represented by people with disabilities, men and boys, older persons, non-binary and transgender persons, and people who are plus-size or full-size.

The campaign's key messaging of “Embrace Every Hue” emphasizes the importance of clean skincare that provides a shade range for everyone to use, as well as the concept that makeup is for everyone and can be an essential part of any daily routine.

With our new lineup, customers can confidently express their individuality and celebrate their unique beauty. They will no longer have to settle for shades that don't quite match or formulas that don't cater to their skin type. Tower 28's new line is built to empower and embrace true colors. The campaign will include those of all diverse ethnicities, ages, abilities, gender identities, sexualities, and disabilities to produce an inclusive launch.

New products include:

- Expanding current shade offering to include 20 new shades and 10 new hues catered to medium/darker skin tones
- Blush and Lip product shade expansion that compliment darker skin tones
- Concealer, powder and bronzer shade expansions for all skin tones

The “Why” Behind “Embrace Every Hue”

Through the production of inclusive and diverse representation in marketing campaigns and the investment in expanding our product offerings (skin tone range) Tower 28 will attract a wider audience, resulting in new diverse groups, new and existing increases in customer loyalty and further enforce Tower 28's brand perception as a company catering to multiple inclusive groups.

“Embrace Every Hue” will also result in an increased market share through its appeal to a more diverse audience and reach new customer segments who may have historically felt underserved by the brand. We don’t anticipate a loss in customers by expanding the campaign due to Tower 28’s existing inclusivity principles and the beginning impact the company has had on diversity. We see this as an expansion and an opportunity to ensure we are serving as many communities as possible.

Content Ideas:

The campaign will feature a series of social media posts and a short-form content mini-series that includes the diverse groups mentioned above.

Influencer Get-Ready-With-Me (GRWM)

- Influencers share transformative routines, highlighting Tower 28 products, fostering inclusivity, and embracing self-expression.
 - TikTok and Instagram are great platforms to use for GRWM for they provide short story opportunities, reels showcasing each product, and the ability to have Tower 28’s socials share on their platform.

What’s the Scoop?

- Collection of personal narratives and explorations by LGBTQ+ individuals and male makeup enthusiasts, diving into their unique beauty journeys. Includes stories that emphasize the “WHY” in men using makeup and how it makes them feel.
 - TikTok, Youtube, and Instagram are great platforms to use for What’s the Scoop, for they provide short and long story opportunities, reels showcasing their why, and the ability to have Tower 28’s socials share on their platform.
 - Tower 28 does not utilize Facebook which is a great place to start with targeting an older demographic, for example, Generation X.

Beauty Beyond Labels

- A series that provides step-by-step guidance for creating captivating makeup looks and effective skincare routines that focus on breaking stereotypes and challenging traditional gender norms associated with makeup.
 - YouTube, TikTok, and Instagram for short- long story forms.

Where Venice meets Santa Monica

- In-person pop-up events in the LA area - playing into their brand locations since each shade/ product is named after a city in California.
 - Using all social media channels to push the pop-up events and showcase the behind-the-scenes and during content. Showcasing the culture within LA.

- Events would include tapping into the culture and vibrancy of the diverse communities in each city, as well as providing equitable access to makeup products. Pop-up events typically include a bunch of influencers with free PR; rather than giving it to those who may not need it, these events will provide free access to new products.

Risks and Mitigation

Loss of Traditional Customers: Including diverse models in your makeup campaign may alienate some of your more conservative or traditional customers who may be uncomfortable with the idea.

- Communicate the brand's values clearly and emphasize that inclusivity benefits everyone. Highlight that makeup is a form of self-expression that knows no gender boundaries.

Cultural Sensitivities: In some cultures or regions, the idea of men wearing makeup may be more controversial or reinforce ideas of toxic masculinity, leading to potential backlash or negative publicity.

- Align the campaign messaging to be culturally sensitive and respectful of diverse perspectives. Consider local cultural norms and sensitivities when planning and executing.

Misrepresentation: Including diverse models in the campaign can appear inclusive just to be inclusive, without genuine representation or understanding of their experiences.

- Ensure that men, BIPOC and other diverse voices are authentically represented and that their stories and experiences are given equal weight. Collaborate with people who have a genuine interest in makeup and can speak authentically to their experiences with the brand.

Brand Impact: Women may be offended that men are being recognized in a market that has historically been female-centric. They may feel like the one safe space they have is being taken away and shared with men.

- Distributing equal weight in the campaign for all groups of makeup users is key and everyone should have the opportunity to express or care for themselves in whatever makes them feel most confident.

Budget

With an estimated \$9.6 million in revenue, we will dedicate 2% of the budget to the marketing campaign, netting out around \$192,000. This will be used to cover the cost of new products, branding, product advertising or PR boxes, paid social ads, potential use of influencers, employee-related costs, content creation and other creative design costs. A cost breakdown below shows the current funding allocations.

- **Production Costs** - \$75,000
- **Employee/ Staffing** - \$60,000

- **Creative Spend** - \$20,000
- **Media & PR** - \$15,000
- **Event Marketing** - \$12,000
- **Additional Budget** - \$10,000

Product Equity Measurement

Our team will measure the success through qualitative and quantitative systems. We will track the metrics of the final campaign launch through social media interaction, search and sales volume.

- Learn about the number of searches and interest in the brand during and after the campaign
- Analyze the demographics of the search volume to ensure key audiences are being met.
- The number of newly introduced products sold in a given time period, particularly in the vicinity of this campaign.

Targeted Universalism as a Measurement Tool

Measure with targeted universalism to ensure our campaign goal is making progress toward the equity gaps we've assessed and identified in a comprehensive and inclusive approach. As well as considering the needs and circumstances of multiple stakeholders and groups involved. We will look towards a strengthened brand image, effective products, and promoting genuine inclusivity.

Looking forward

As Tower 28 continues on its inclusive product journey a few things future campaigns we'd like to implement include accessible packaging that meets inclusivity standards. While there are no current ADA standards for packaging, Tower 28 will work to launch a campaign that is designed by groups who have historically struggled with packaging accessibility. Every product will be made through an inclusive design lens. Products that won't roll away, magnetic closure, no screw on/off caps, easy accessibility

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