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Introduction

The success of any business and that of its employees depends very largely on the employees themselves, and so we look to our employees to play their part as we shall continue to play ours. We provide equal opportunities to existing and potential employees and are committed to upholding an ethical code of conduct of standards and professionalism in the way we do business. The code of ethics is founded on the core principles of ….

- protecting confidentiality and data privacy
- acting with integrity and professionalism
- avoiding conflicts of interest
- fairness in our dealings with others
- treating others with dignity and respect
- representing Blacknight appropriately
- upholding our commitment to transparency and the truth by reporting wrongdoing

Protecting confidentiality and privacy

All staff members have a duty of confidentiality regarding the work they do and the information they handle and retain. This duty of confidentiality seeks to prevent the unauthorised disclosure and misuse of confidential information in all its forms and to protect the personal data held by Blacknight on behalf of its clients and staff. Staff members' obligations with regard to the privacy and confidentiality of information are governed by EU GDPR regulations which is also managed within our ISO27001:2013 framework. Staff are required to comply with the information security policies published on policies.blacknight.ie to ensure that access to information is restricted to only those who need it for the performance of their duties. Any information which may be considered confidential or commercially sensitive, including information about other staff members, Blacknight, contractors or third parties associated with Blacknight, should not be shared under any circumstances. If you have any queries or concerns relating to information security or data privacy which cannot be answered in the existing security policies, they should be referred to the ISMS manager.

Further details can be found in the following documents

- Social Media policy
- Access Control Policy
- Data Protection policy
- Internal Communications Policy
- Information Security Policy

Acting with integrity and professionalism

Each staff member has an individual responsibility to protect Blacknight's good reputation. Each staff member is required to refrain from acting in a manner which he or she knows, or suspects, is illegal, improper or dishonest. Staff members are also required, in the conduct of their work, to take all reasonable steps to ensure that Blacknight complies with its legal and regulatory obligations.

For further details on regulatory requirements, contact the ISMS manager.

Avoiding conflicts of interest

A conflict of interest arises when personal, commercial or political associations or interests inappropriately affect our judgement or actions when performing our duties. Staff must never use or attempt to use their position in Blacknight to obtain any improper benefit for themselves, their family, or others connected to them, and must always seek to avoid not only actual, but also potential or perceived, conflicts.

There are a very wide range of situations that could give rise to actual, potential or perceived conflicts of interest. In all such circumstances, members of staff have an obligation to act to avoid such conflicts and to contact their line manager, or the ISMS manager. Outlined below are examples of the main areas where a conflict could arise

1. Receiving or being offered hospitality or gifts designed to influence a decision-making process.
2. Staff involved in procuring goods on behalf of Blacknight should avoid in engaging in any behaviours which could give rise to a potential conflict of interest in the procurement process

More detailed information can be found in the Anti-Corruption Policy.

Treating others with dignity and respect

Blacknight is committed to maintaining a positive, progressive and fulfilling working environment where all staff are treated equally and respected for their individuality and diversity. Blacknight does not tolerate any form of staff bullying, intimidation or harassment. Staff members are required to comply in full with the Employee Handbook (section3, pg56-62) which outlines our policies on equality, bullying, personal harassment etc.

The Employee Handbook can be found on policies.blacknight.ie

Representing Blacknight appropriately

All staff should be aware that Blacknight's reputation can affected by the actions of its staff both in staff interactions directly with customers, or by publicly expressing views and opinions in online forums, social media or any other public forum.

Unauthorised public communication relating to a security incident or data breach is expressly forbidden without the consent of the CEO

Further details can be found in the

- Social Media policy
- Internal communications policy

Being transparent

Blacknight are committed to conducting business in a fair, open and transparent manner and publish Blogs, status posts, transparency reports to facilitate openness with our customers. Our employees are expected to respond openly and truthfully to customer queries whilst being aware of compliance regulations, data privacy, validation processes etc. Blacknight issue official RFO's (Reasons for Outage) in the event of any disruption to service, or a breach of SLA (service level agreements) which outline in full the root cause of the issue and the steps we are taking to remediate it. These RFOs or any breach notification should only come from an authorised source within Blacknight and should be reviewed by Managers prior to publication to ensure the language is clear and concise so that the message is understandable and transparent.

For further details on public communications, contact the ISMS manager or refer to

- Internal Communications Policy

Reporting breaches of this policy

All staff are required to report breaches of this policy and this can be done directly to their manager, CEO, HR department or the ISMS manager, or can be done anonymously via a drop-box facility located in the canteen area.

Further details on bullying and harassment can be found in the Employee Handbook