



**Middlesex
University
London**



POINT BLANK
MUSIC SCHOOL

Policy Title	Anti Bribery and Corruption Policy				
Staff type	Non Academic		Academic		All staff <input checked="" type="checkbox"/>
Approved by	Managing Director				
Owner	Managing Director				
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	Student Access				<input type="checkbox"/>
	Public Access via Point Blank website				<input type="checkbox"/>

Anti-Bribery & Corruption Policy

1. Introduction

1.1. Point Blank values its reputation for ethical behaviour and for financial integrity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Point Blank's aim therefore is to limit the Company's exposure to bribery by:

- a) Setting out a clear Anti Bribery and Corruption Policy
- b) Informing employees of the different forms bribery can take so that they are able to avoid them
- c) Encourage employees to be vigilant and to report any suspicion of bribery
- d) Rigorously investigating any allegations of bribery
- e) Taking firm and vigorous action against any individual found to be involved in bribery.

POINT BLANK FORBIDS THE PAYING OR RECEIPT OF BRIBES FOR ANY PURPOSE.

2. The Policy

2.1. Bribery is defined as:

2.1.1. *"the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another's behalf."*

2.2. Bribery is a criminal act covered by the Bribery Act 2010 and Point Blank will involve the relevant authorities if bribery is suspected.

2.3. Point Blank prohibits:

Bribery of or by any person or Company acting on Point Blank's behalf in order to:

- a) gain any commercial, contractual or regulatory advantage for Point Blank in a way which is unethical or;
- b) gain any personal advantage, either financial or otherwise, for the individual or anyone connected with the individual.

2.4. Facilitation payments are any payment made (except when it is in line with a published tariff) as an inducement to secure or expedite the performance of a particular activity. These are not permitted or condoned by Point Blank.

The policy is not designed to prohibit the following:

- a) Normal and appropriate hospitality
- b) The giving of a gift on a special occasion
- c) The use of any recognised fast-track process which is available to all on payment of a fee

2.5. Involvement in bribery is an act of Gross Misconduct and, if found guilty, an employee may be summarily dismissed.