

OMNIBUS THEATRE

OMNIBUS THEATRE ANTI-BRIBERY POLICY

1. Policy Statement

The Omnibus Theatre rejects bribery in all its forms and, accordingly, no employee may make, or take, bribes in any way connected with business or any part of it. The same prohibition will apply to any external agent, consultant or other “associated person” in any context where Omnibus determines there is a potential risk of bribery occurring.

2. Meaning of Bribery

“Bribery” is defined in The Bribery Act 2010. The definition is relatively complex for an act which most people would in their own minds define rather more simply. Omnibus seeks to be clear as to what is bribery, and this is as follows considering the three points below.

- A financial or other advantage given, offered, promised, requested, received, agreed, or accepted, including where a third party ultimately benefits from any such act
- An act that can reasonably be viewed as either:
 - a) Intended to influence someone to perform a duty improperly or to reward a person for so doing, or
 - b) An inducement to a person to perform a duty improperly or to reward any person for so doing
- An act that can reasonably be viewed as intended to result in a business advantage to the Omnibus or any third party

3. Business Entertaining

According to government guidance, the new legislation generally seeks to exclude from the meaning of bribery reasonable business entertaining.

The key points are as follows:

- Entertaining business contacts is generally a legitimate activity although this would normally not exceed the offer of a meal and/or theatre tickets.
- Omnibus will accept expense claims by employees that are reasonable in all the circumstances but even in special cases the cost per head should not exceed £50 plus VAT where applicable without prior approval.

Other points to note in this regard are:

- Claims forms will still need to name, and explain the relationship with, each of the parties entertained
- The Omnibus Theatre staff should not normally make up more than 50% of the number of people entertained
- Under the new law, there is no generally permitted acceptable level of expenditure; accordingly, if business entertaining in any context could be treated as bribery (as defined above), it should be avoided, although given the limits specified this is very unlikely to be the case

OMNIBUS THEATRE

- Employees must refer proposed entertaining that might contravene the guidelines to the Artistic Director for approval; claims falling outside the guidelines which have not been pre-approved may be rejected in whole or in part.

4. Reporting of Hospitality and Gifts

The reporting of hospitality and gifts will continue as a requirement for all staff. The current requirement is that all staff must report to the Artistic Director any hospitality or gifts with an individual value more than £200.

All staff must use their own discretion to assess whether gifts or activities may be bribes. Factors to consider include:

- The intention behind the gift.
- The nature, value, and timing of the gift.
- Whether the gift is given openly rather than secretly.
- Whether advantage, favours, or benefits are expected in exchange.

5. Policy Breaches

Proven policy breaches (other than where related to business entertaining involving meals and/or theatre tickets) will be considered as gross misconduct for the purposes of the applicable terms and conditions of the relevant person's employment. Accordingly, the consequence may be as severe as summary dismissal.

In cases of breaches of financial limits where the entertaining involves meals and/or theatre tickets, in circumstances where breach of the limits has not been pre-approved, Omnibus reserves the right to institute the appropriate disciplinary procedure.

6. Whistleblowing, Reporting and Guidance

The Board of Trustees and Management consider that any form of bribery would be grossly offensive to every employee and officer of Omnibus, particularly given the theatre's charitable nature and its objectives within our society. Accordingly, if any employee wishes to disclose possible instances of bribery, he or she should feel free to do so at any time. Absolute confidentiality as to the identity of any such employee shall be respected so far as legally possible.

Please see the Whistleblowing Policy, available on the staff intranet, for guidance as to protection from discrimination and the procedures for making disclosures.

If any employee simply wishes to discuss any aspect of the policy, he or she should feel free to contact at any time the Artistic Director

Should any employee be approached by any person in circumstances where a bribe is being offered to, or required of, such employee, then in these circumstances it will be expected that such employee will of course decline the offer and notify the Artistic Director.

Omnibus Theatre is a multi-award-winning independent theatre in Clapham, South London. Finalist in the Fringe Theatre of the Year 2020 and 2023 The Stage Awards, Off-West End Award winner

OMNIBUS THEATRE

2018 and 2020, and recipient of the Peter Brook/Royal Court Theatre Support Award in 2016. The heart of the organisation's ambitious programme lies in classics re-imagined, modern revivals and new writing. Omnibus Theatre also provides a platform for LGBTQ+ work and aims to give voice to the underrepresented and challenge perceptions. Since opening in 2013 notable in-house productions include Woyzeck (2013), Macbeth (2014), Colour (2015), Mule (2016), Spring Offensive (2017), Zeraffa Giraffa (2017), Queens of Sheba (2019), The Little Prince (2019), RICE! (2021), The Human Connection (2021), The Girl Who Was Very Good At Lying (2021), FIJI (2022), SAD (2022), DRUM (2022), The Woman Who Turned into a Tree (2023) and Compositor E (2023).

Omnibus Theatre is led by Artistic Director Marie McCarthy and Executive Director Bridget Kalloushi. Patrons include Dame Judi Dench, Sir Lord Michael Cashman, Paulette Randall MBE and Rikki Beadle-Blair MBE.