



Public Protection
Thurrock Council
New Road
Grays
Essex RM17 6SL

Essex Police Licensing Dept.
PO BOX 12306
Witham
Essex. CM8 2AS

17th August 2016

RE: REVIEW OF STATEMENT OF PRINCIPLES – GAMBLING ACT 2005

Dear Sirs

As a statutory consultee to the above, Essex Police welcomes the latest version of the Authority's Statement of Principles which we fully support.

Essex Police would seek to make two specific representations that may enhance the Authority's Statement and would seek to correct an inaccuracy contained within Appendix B relating to the contact details of Essex Police.

Representation 1

In those parts of the Authority's Statement concerned with 'location' (section 15.7), reference is made to organised crime. There appears to be no definition of this phrase within the Statement.

Essex Police would ask that the Authority does not limit its interpretation of 'organised crime' to a narrow one, but extends its interpretation to cover activity conducted by an 'organised crime group' (as defined under Part 3 Section 45 of the Serious Crime Act 2015) – which is defined as *'a group which has at its purpose, or one of its purposes, the carrying on of criminal activities and consists of three or more people who agree to act together to further that purpose'*.



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Representation 2

Section 15.7 of the Statement lists a number of specific location issues which may be the subject to relevant representations.

Essex Police would invite the Authority to consider whether an additional location consideration should be included, specifically:

- Areas with a high level of acquisitive crime (e.g. shoplifting, burglary, theft and robbery).

The rationale of this suggestion is that gambling establishments provide an opportunity to 'launder' the proceeds of crime by disguising the origin of cash winnings. Offenders who trade stolen items for cash will often try to find a way of 'legitimising' such cash; cash which may later found in their possession during police investigations and which may otherwise incriminate them.

Correction

Appendix B incorrectly states that the address of Essex Police for Gambling Act 2005 representations etc. is Grays Police Station.

The correct address for such representations etc. is:

Essex Police Licensing Department
PO Box 12306
Witham
Essex
CM8 2AS

Yours faithfully

Gordon Ashford

Substance Misuse and Licensing Coordinator
Local Policing Support Unit