

Deputy David Johnson

Chair - Economic & International Affairs Scrutiny Panel

BY EMAIL

20th May 2021

Reference: Medicinal Cannabis

Dear Deputy Johnson

Thank you for your letter received at our offices 7th May 2021. G4S Secure Solutions (Jersey) Limited is grateful for the opportunity to submit our views on the security aspects of Medical Cannabis licencing.

The answers provided by G4S are based not only on our knowledge and experience of the medical cannabis industry in Jersey that we are involved in, but also our experience in other jurisdictions where we provide secure solutions to licenced growers.

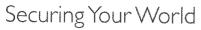
The following is put forward without prejudice.

1. Do you think there are any challenges to monitoring and policing a Medicinal Cannabis plantation that could be specific or unique to Jersey?

Despite Jersey enjoying a generally low crime rate, cannabis is a product with a high illicit value; this will always make it a potential target locally, especially as the 'street value' in Jersey is significantly higher than elsewhere. When assessing the risk for any particular growing site, consideration should be given to the fact that as an Island close to mainland Europe where medical cannabis laws are stricter, there is a risk that growing sites may be seen as an 'easy target'. Transportation of the product on or off Island should be carried out as 'valuables in transit' collection / delivery, in the UK

this would be a 'licensable activity' under the **Private Security Industry Act 2001** —the principles of this law should be applied to these movements.

Medicinal Cannabis is a high-value crop which will need to be grown in secure plantations. Please could you describe the type of security infrastructure you think will



















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be needed to adequately monitor and police a Medicinal Cannabis plantation? (e.g. anything from manpower to CCTV and perimeter fencing)

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A full site security survey should be carried out by a qualified person, to British Standard 16000:2015 The site and building security measures adopted in a particular location will be affected by the:

- Location and wider environment
- Scale of the business, size of premises, staff numbers etc
- Amount of product to be held on the premises

The list below outlines some common security arrangements for prospective or existing licenced growers. Licence applicants should consider the following when establishing security procedures at their premises.

- External doors and windows fitted with secure locks;
- Where possible, and amounts permit, bulk stocks kept on racks above ground level.
- The premises and the area where the medical cannabis are stored protected by an intruder detection system. Applicants should have an alarm installed by an alarm company registered with the National Security Inspectorate (NSI).
- The alarm system should be monitored by an off-site company which is alerted when the system is activated.
- The company which receives the alert may undertake to notify the police in the event of an alarm activation; Certain levels of police response attached to the alarm (e.g. 'immediate' or 'level 1') would be the most appropriate;
- An agreed set of Standard Operating Procedures (SOPs) should exist which governs the manner in which the product is produced, stored and handled on site, subjected to periodic stock checks.
- A perimeter fence & lockable/ access control gates (planning regulations permitting);
- Perimeter surveillance e.g. detector-activated CCTV which is recorded;
- External doors (including fire escape doors) manufactured to the recommended standard (LPS 1175 SR4);
- An electronic access control system with a clear audit trail e.g. swipe cards or fobs used by all staff.
- A prefabricated strong room (PSR) that has been certified to CEN Grade VI of BS/EN 1143-1. Product stocks that are too large to be accommodated in a safe should be held in a PSR which is formed from panels that are bolted or welded together depending on the supplier. PSRs can be constructed to virtually any size consistent with the scale of a licensee's business and can be equipped internally with racking to hold multiple pallets of stock and to permit forklift operations.
- Consideration should be given to a search regime to be put in place for staff exiting the 'live zone'.

















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3. Do you think that Medicinal Cannabis plantations in Jersey could provide new opportunities for local private security firms, both in the supply of equipment and manpower?

G4S are engaging with the industry in Jersey to ascertain the level of security they are anticipating will be required. We would envisage an increase in manned guarding requirements (Searching staff out), security systems installation (CCTV, INTRUDER, Fire detection) and on-going maintenance of these systems.

4. Do you think Medicinal Cannabis businesses in Jersey will have any issues sourcing the security equipment that will be needed to build the infrastructure for a secure Medicinal Cannabis plantation?

Whilst G4S can only comment on our own experiences and supply chain planning, we do not foresee any issues in sourcing the equipment required to ensure the industry is secured to the standard required.

Should you require any further information please do not hesitate to contact me.

Kind Regards

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