

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

We work with a high-value product and a lot of cash. Although it's uncommon for a dangerous situation to occur, it's **important to feel safe and secure while you work in a licensed facility or when you are transporting cannabis**. It is also important for our patients and caregivers to feel **safe and secure while shopping** at our dispensaries.

Be familiar with your facility and unique security details. Always be **attentive to your surroundings**. If you see something suspicious, report it. If you see someone in the facility you don't recognize, introduce yourself and make sure they have their employee identification badge properly displayed or if they are a visitor, that they have been properly checked in as a visitor and are wearing their licensee-issued visitor pass. If you **feel unsafe or threatened**, remove yourself from the situation. If possible, **reach out to a manager and/or call the police**.

Be aware of where your **duress/silent alarms/panic buttons** are located. Only permit employee access to areas of the facility that are necessary for their workflow.

Being **aware and proactive** are imperative to recognizing potentially dangerous situations.

Upon request, the business must make all information relating to its Security Plan, security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, audio/video footage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security-related information to the AMCC.

Security Professionals

Your facility will have at least (1) security guard on site during operating hours. Even though they are present, it's important to remember, security is a focus for all employees. The safety of everyone in and around the facility is dependent upon each employee following all security protocols and paying attention.

Security Equipment

We also have the following:

- Well-lit indoor and outdoor areas
- Alarms
- Duress panic and hold-up alarms
- 24/7 audio/video surveillance systems with motion detection
- Locked commercial doors
- Secure rooms
- Safes/Vaults
- Broadcast communication devices
- Perimeter fencing or barriers

Audio/Video Surveillance Systems

The audio/video surveillance system must be fixed in place, covering both the interior and exterior of the facility, with quality and lighting to allow for the clear ID of individuals and activities, including, but not limited to all entrances, exits, parking lots, and any area where medical cannabis is delivered, received, handled, stored, prepared, dispensed, or sold. It must clearly and accurately display the time and date and audio must clearly and accurately capture sound w/in camera range at 20 decibels or greater.

Audio/Video surveillance records must be **kept for at least (60) days**, and longer upon request from the AMCC or law enforcement. Recordings potentially reflecting diversion incidents must be kept for (2) years, or until resolution of the incident.

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Alabama

The surveillance system records 24-hours a day, 365 days a year without interruption. Cameras are placed in the following locations at a minimum:

- Safes/Vaults/Cash Handling Areas
- Cultivation/Processing Areas
- Sales areas/Each POS
- Storage areas
- Destruction areas
- Storefronts
- Entrances/Exits
- Parking Lots

Security, just like compliance, is ALL of our jobs!

Preventing Unauthorized Intrusion

A best practice to avoid potentially dangerous situations is to prevent unauthorized access to the facility.

Per the AMCC, exterior doors must be designed or reinforced to withstand unlawful forcible entry. Exterior doors must remain locked against outside intruders at all times, while allowing free egress by facility occupants in the event of an emergency. Keycard or other similar electronic access must be required for ingress. Patients and caregivers may be granted access by personnel only upon showing a valid, unexpired, and unrevoked medical cannabis card. The business must prohibit entry of members of the public, other than registered patients and caregivers. Electronic or manual records must be kept of all persons on the premises at all times, including employees, vendors, transporters or other licensees, all official visitors, patients, and caregivers.

Strict access controls must protect areas where medical cannabis and daily monetary receipts are handled or stored - in a secured, locked room or vault. Protocols must be in place for beginning and end of day movement of medical cannabis and cash between secure areas and sales areas, as well as a plan for maintaining security of daily cash on hand at all times.

Tailgating

One of the most common types of unauthorized access is tailgating, which occurs when one or more people follow an authorized user through a door. Often the user will hold the door for an unauthorized individual out of common courtesy, unwittingly exposing the building to risk. Decrease the likelihood of tailgating by training your team on security and awareness. An effective reduction technique is to implement “mantraps” that restrict entry to one individual at a time and don’t permit anyone to circumvent them.

Door Propping

Similar to tailgating, propping doors open, most often for convenience, is another common way unauthorized individuals gain access to a location and potentially create a dangerous situation for the people and assets within. Some access control systems include the capability to detect when doors are propped, alerting security personnel or managers who can respond and investigate the situation as needed.

Levering Doors

You might be surprised to know how easily many doors can be levered open using something as small as a screwdriver or as large as a crowbar. Advanced access control systems include forced-door monitoring and will generate alarms if a door is forced open. They are highly effective at detecting door levering.

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

Access Cards

With the added advantage of identifying authorized users who swipe in with an access control reader, electronic key cards are a more high-tech alternative to traditional keys. They are prone to the same risks associated with keys, namely the potential to be lost, stolen or shared with an authorized or unauthorized person.

There are four main categories of access cards: Magnetic stripe, proximity, proximity smart cards and contact smart cards. Magnetic stripe cards are the easiest to duplicate and are susceptible to wear and tear or damage from magnetic fields. Proximity cards and smart cards are much less susceptible to duplication, and smart proximity cards can be programmed with much more information than access cards, allowing them to be used for a variety of interactive applications in addition to physical access, including network access. Some proximity smart cards, however, require a small battery, which can diminish their lifespan.

The effectiveness of access control cards can be improved if they also serve as photo ID cards, which decreases the likelihood that individuals will forget them at home. Complementary technologies and solutions, such as individual identification cards and/or biometrics, bring even greater reliability and effectiveness to access cards.

Biometric Access Control

Biometrics are the analysis of biological data using technology. Typically, this data relates to specific physical traits that an individual might have. So, biometric access control is the use of this biological data to either grant or deny access to a building or area of a building. Biometric access control systems may use unique characteristics like fingerprints, facial features, retina, or voice to allow entry to certain properties, buildings, or rooms.

Unauthorized access can create dangerous situations for any business or organization. If your organization is susceptible to any or all of these risks, it's important to seek access solutions that will address those specific risks to reduce or even eliminate the possibility of unauthorized access and ensure the highest level of security for your facility.

Deescalating Potentially Dangerous Situations

Be **attentive to verbal and non-verbal signs** of potential violence and pay attention to your “gut instinct.”

Your intuition can be a great support to you. This “gut feeling” may show up in our body as; increased heart rate, perspiration, nausea, feeling indecisive and/or hair rising on the back of your neck.

Some *verbal* warning signs of a potentially dangerous situation:

- Threats – Direct or Veiled
- Threats – Conditional
- Boasts of prior violence or of losing control
- Confused thinking
- An increase in pitch when speaking – indicates throat is tightening
- Repetitive word use, parroting and or echoing
- Forced or strained speech
- A nervous laugh or laughing at inappropriate times (Laughing may be a way for a body to shed emotions)
- Yelling or screaming
- Non-stop profanity

Some *non-verbal* signs of a potentially dangerous situation:

- Personal space violation
- Standing toe to toe
- Finger pointing
- Making fists
- Staring through you
- Face flushing
- Heavy breathing and/ or flaring nostrils
- Person refuses any eye contact
- Someone blocks egress

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

538-X-8-.05 Applications And Licensing Procedures As To Dispensaries Generally.

(3) Procedure for Filing Application - Exhibits to Dispensary's Application. Exhibits to the Dispensary Applicant's application information shall include all those as provided in subparagraphs 3.m.(1) through 3.m.(16) of Rule 538-X-3-.05 of Chapter 3 of these Rules, unless specifically provided otherwise as follows:

(h) Dispensary applicants must provide a detailed plan for handling money and allocating and remitting taxes as required by any local, state or federal agency.

(m) The Dispensary Applicant's Security Plan must include a plan for security at each facility, including but not limited to the following:

1. Twenty-four-hour alarm systems must be installed in all facilities where cannabis or medical cannabis products are present. Such alarms shall be provided and installed by experts in industry-standard commercial grade alarm systems. Alarm systems must be fully operational, securing all entry points and perimeter windows, be equipped with motion detectors and pressure switches, and must cover all areas where cannabis or medical cannabis products are delivered, received, handled, stored, prepared, dispensed or sold.

2. Reception areas and personnel adjacent to ingress and egress points shall have ready access to duress panic and hold-up alarms that may be activated in the event of access by unauthorized personnel or intruders.

3. Broadcast communication devices (cell phones, intercom equipment or the like) must be:

- i. Carried by each employee or installed in all areas of each Dispensary's facility designed for regular access by humans.
- ii. Accessible for communication by all personnel at all times, and particularly at perimeter ingress/ egress stations, facility reception areas, and the security office.
- iii. Capable of providing information with sufficient clarity to be heard and understood by all personnel and visitors within earshot of the employee receiving the communication.

4. Dispensary's facilities shall maintain an audio/video surveillance system that shall be in continuous operation 24 hours per day. Cameras shall be fixed in place covering both the interior and exterior of the Dispensary's facility, in such quantity, with such lighting, and at such resolution as shall allow for the clear identification of individuals and activities in all reasonably accessible areas of the premises, including but not limited to all entrances, exits, parking lots, and any area where cannabis or medical cannabis is delivered, received, handled, stored, prepared, dispensed, or sold. Audio/Video surveillance recordings must clearly and accurately display the time and date. Audio recordings shall clearly and accurately capture sound within camera range at a level of 20 decibels or greater.

5. As to any facility owned by a dispensary at which medical cannabis is maintained, except a dispensary site, the dispensary must surround the perimeter of such facility with a sufficient fence or barrier to prevent access by unauthorized persons and must have sufficient lighting to allow for the proper functioning of video surveillance equipment at all times between dusk and dawn or at any other time when ambient lighting requires enhancement to permit identification of individuals and activities upon or immediately adjacent to the premises. Indoor premises must likewise be sufficiently lit to allow for the identification of individuals and activities.

6. Exterior doors of each facility operated by a Dispensary must be designed or reinforced to withstand unlawful forcible entry; exterior doors shall remain locked against outside intruders at all times, while allowing free egress by the facility's occupants in the event of an emergency; doors must permit ingress to employees and other appropriate persons (other than Patients and Caregivers) only by means of a keycard or other similar electronic access device. Patients and caregivers may be granted access by Dispensary personnel only upon showing a valid, unexpired and unrevoked medical cannabis card.

7. A dispensary site must be housed (A) in a stand-alone building or (B) within a multi-use structure, strip mall or other such retail facility; the area occupied by the dispensary site is not to be accessible to or used by neighboring businesses,

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

other tenants or others not employed by the dispensary. To the extent that the dispensary site is housed within a multi-use structure, strip mall or other such retail facility, the dispensary site must be self-contained, or at a minimum, segregated from other businesses and activities being conducted in the multi-use structure, strip mall or other such retail facility by separate points of ingress and egress or, at a minimum, separately keyed and electronically protected entryways accessible only to employees of the dispensary; patients and caregivers; AMCC representatives and their guests; representatives of other licensees; vendors, cleaning crew personnel, and repair workers carrying out business-related functions on the premises; representatives of the lessor during routine inspections or similar circumstances warranting a physical visit to the premises; or other appropriate individuals.

8. Dispensary Facilities must maintain sufficient staffing of security guards at each facility where cannabis and medical cannabis is present to reasonably ensure the safety of the products stored therein; however, the dispensary must provide, at a minimum, one (1) security guard per facility during the facility's business/operating hours.

9. Strict access controls shall protect areas where cannabis or medical cannabis and daily monetary receipts are handled or stored - in a secured, locked room or vault.

10. Protocols for beginning-of-day and end-of-day movement of medical cannabis and cash between secure areas and sales areas, as well as a plan for maintaining security of daily cash on hand at all times.

11. Members of the public, other than patients and caregivers holding a valid, unexpired, unrevoked medical cannabis card, are not allowed inside a dispensing site. Records, whether electronic or manual, must be kept of all persons on the premises at a facility at all times, including employees, vendors, transporters or other licensees, and all official visitors, recording the individuals' name, date, time of ingress and egress, and (as to non-employees) the reason for their presence; such records shall be kept for a minimum of two years, and longer at the request of the Commission or law enforcement.

12. Audio/Video surveillance records must be kept for at least 60 days, and longer upon the request of the Commission, its inspectors, or any law enforcement personnel. Audio/Video recordings potentially reflecting an incident of actual or attempted diversion must be kept for the longer of a period of two years, or until resolution of the incident and apprehension and discipline or prosecution of the individuals involved in the actual or attempted diversion.

13. Employees, while on duty, shall wear identification badges that clearly identify them as employees.

14. Visitors, including vendors, other licensees, Commission members, inspection personnel, or other representatives must wear a "visitor pass" or "AMCC Official" pass, as applicable, at all times while on the premises.

15. Dispensaries shall maintain, review and update policies to report theft, diversion, or other loss of cannabis products to the Commission and to law enforcement as early as practicable and not more than 24 hours from the event or its discovery.

16. Upon request, a Dispensary shall make available to the Commission or its inspectors all information relating to security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, audio/video footage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security-related information deemed relevant by the Commission or its inspectors.

17. Upon request, a Dispensary shall make available to the Commission or its inspectors all information relating to the Dispensary's security plan.

18. Signage. The dispensary shall prominently display at each entrance point to a dispensing site and in at least one location in the sales area of the dispensing site signs stating as follows: "WARNING: This facility is monitored at all times using audio and video surveillance. Entry to this business and purchases within are strictly prohibited except as to registered patients and caregivers presenting valid identification as required by law."

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

(n) The number of patients, caregivers and others on the premises at a dispensing site at any given time may not be more than can be reasonably monitored by the employees present in the retail area, and in no event shall the total number of individuals on the premises exceed that permitted by the applicable fire code.

538-X-4-.07 Duty To Meet And Maintain Standards, Policies, Procedures and Operations Per Application.

A licensee has an ongoing duty to meet and maintain the standards, policies, procedures, and operations as it affirmed to the Commission at the time of licensing, as such standards, policies, procedures, and operations may have been amended by the licensee from time to time in accordance with Rules 538-X-4-.08 and 538-X-4-.19. Specifically, at the time of the licensee's precommencement inspection and at each inspection thereafter, a licensee must meet and/or maintain the following, in the manner previously provided at the time of licensing, as updated (i.e., current to within 30 days, unless otherwise required):

(12) The following documents, labeled, and in the following order:

(o) The licensee's verified Standard Operating Plan and Procedures. The licensees must demonstrate and maintain standard operating procedures regarding the following subjects in such a way that they can be readily accessed from the physical site of operations upon the request of inspectors, the Commission, or Commission staff, including, at a minimum, the following:

11. A Security Plan as to each of the licensee's facilities, addressing all of the following aspects of security and meeting the following minimum thresholds:

- i. Alarm systems must be installed in all facilities where cannabis or medical cannabis is maintained or stored. Such alarms shall be provided and installed by experts in industry standard commercial-grade alarm systems. Alarm systems must be fully operational securing all entry points and perimeter windows, be equipped with motion detectors and pressure switches covering all areas where cannabis or medical cannabis is grown, handled, stored, prepared, transported, tested, or dispensed.
- ii. Reception areas and personnel adjacent to ingress and egress points shall have ready access to duress panic and hold-up alarms that may be activated in the event of access by unauthorized personnel or intruders.
- iii. Licensee facilities shall maintain an audio/video surveillance system that shall be in continuous operation 24 hours per day. Recording devices shall be fixed in place covering both the interior and exterior of the facility, in such quantity and at such resolution as shall allow for the clear identification of individuals and activities in all reasonably accessible areas of the premises, including but not limited to all point-of-sale areas, entrances, exits, parking lots, and any area where cannabis or medical cannabis is grown, handled, stored, prepared, transported, processed, packaged, labeled tested, or dispensed. Audio recordings shall clearly and accurately capture sound within camera range at a level of 20 decibels or greater. Audio/video surveillance recordings must clearly and accurately display the time and date.
- iv. The facility's perimeter and any outdoor premises must be surrounded by a sufficient fence or barrier to prevent access by unauthorized persons and must have sufficient lighting to allow for the proper functioning of video surveillance equipment at all times between dusk and dawn or at any other time when ambient lighting requires enhancement to permit identification of individuals or activities upon or immediately adjacent to the premises. Indoor premises must likewise be sufficiently lit to allow for the identification of individuals and activities.
- v. Exterior doors of each facility must be designed or reinforced to withstand unlawful forcible entry; exterior doors shall remain locked against outside intruders at all times, while allowing free egress by the facility's occupants in the event of an emergency; doors must permit ingress to employees and other appropriate persons only by means of a keycard or other similar electronic access device.
- vi. Exterior walls of each facility must be reinforced to withstand unlawful forcible entry. Windows, likewise, must be reinforced to prevent breakage by outside intruders.
- vii. Licensees must maintain sufficient staffing of security guards at each facility where cannabis and medical cannabis is present to reasonably ensure the safety of the products stored therein; however, licensees must maintain, at a minimum, one (1) security guard per facility during the facility's business/operating hours.
- viii. Strict access controls shall protect areas where cannabis or medical cannabis is handled or stored - in a secured, locked room or vault.
- ix. Records, whether electronic or manual, must be kept of all persons on the premises at a facility at all times, including employees, vendors, transporters, medical cannabis patients and caregivers, and all others, recording the individuals' name, date, time of ingress and egress, and (as to non-employees) the reason for their presence; such records shall be kept for a minimum of two years.
- x. Audio/Video surveillance records must be kept for at least 60 days, and longer upon the request of the Commission, its inspectors, or any law enforcement personnel. Audio/Video recordings potentially reflecting an incident of actual or attempted diversion must be kept for the longer of a period of two years, or until resolution of the incident and apprehension and discipline or prosecution of the individuals involved in the actual or attempted diversion.

Security, Preventing Unauthorized Intrusions & Deescalating Potentially Dangerous Situations

Alabama

- xi. Employees shall wear identification badges that clearly identify them as employees while on duty.
- xii. Visitors, including Commission members, inspection personnel, or other representatives, shall wear a "visitor pass" or "AMCC Official" pass, as applicable, at all times while on the premises.
- xiii. Licensees shall maintain, review and update policies to report theft, diversion or other loss of cannabis or medical cannabis to the Commission and to law enforcement within 24 hours of the event or its discovery.
- xiv. The Licensee, upon request, shall make available to the Commission or its inspectors all information relating to security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security-related information deemed relevant by the Commission or its inspectors.
- xv. Any information and/or documents specific to the category of licensee (Cultivator, Processor, Secure Transporter, Dispensary, Integrated Facility, State Testing Laboratory,) as identified separately in these Rules.