

**From:** [redacted]@health.gov.je>  
**Sent:** 15 September 2021 09:30  
**To:** Richard Renouf  
**Cc:** [redacted]  
**Subject:** Medical Cannabis Review  
**Attachments:** Medical Cannabis Report September 2021 v1.4.docx

Dear Minister

You may recall we met earlier this year in response to some concerns identified regarding the practise of prescribing Medical Cannabis. We agree to undertake a review which would consider the areas of concern and provide an overview of how clinics are operating. I attach the report from that review for your perusal.

Both [redacted] and [redacted] would welcome the opportunity to meet again to discuss the findings of the review and agree next steps. Both feel it would be of benefit to invite [redacted] to join us as he has been liaising with SoJ Police regarding this matter.

I will endeavour to arrange a meeting in the coming weeks but if you have any queries in the meantime, please do not hesitate to contact me.

Kind regards

[redacted]  
[redacted]  
Primary Care Governance Lead  
Health and Community Services

Direct: 01534 [redacted]  
Email: [redacted]@health.gov.je

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Health and Community Services  
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Government of  
**JERSEY**

**MEDICAL CANNABIS  
GOVERNANCE REVIEW  
SEPTEMBER 2021**

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Author	[REDACTED] Primary Care Governance Lead [REDACTED] Primary Care Governance Officer
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1.0	[REDACTED]	18.06.2021	Created
1.1	[REDACTED]	23.06.2021	Addition of information relating to guidance, training and best practice
1.2	[REDACTED]	01.07.2021	Addition of information relating to training, indemnity, clinical governance
1.3	[REDACTED]	06.07.21	Addition of information relating to Medicann
<b>1.4</b>	[REDACTED]	15.09.21	Additional information and update

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### RELEVANT LEGISLATION:

Consideration should be given to the relevant areas of Misuse of Drugs Legislation that give certain powers. These include:

- [Article 26 - Misuse of Drugs \(General Provisions\) \(Jersey\) Order 2009](#)
- [Articles 29 and 30 - Misuse of Drugs \(General Provisions\) \(Jersey\) Order 2009](#)
- [Article 15 - Misuse of Drugs \(Jersey\) Law 1978](#)
- [Article 17\(1\)\(b\) - Misuse of Drugs \(Jersey\) Law 1978](#)

## BACKGROUND

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In a meeting with the Minister for Health and Social Services, Deputy Richard Renouf, the Chief Pharmacist, [REDACTED] the Medical Director and Responsible Officer for Primary Care, [REDACTED], and [REDACTED], the Primary Care Governance Lead, held on 26 April 2021 in response to concerns raised regarding the practise of prescribing medical cannabis, it was agreed to undertake a review which would form the basis for developing a robust governance structure, locally, for those services providing medical cannabis to patients.

Following that meeting, a planning meeting was held by the Primary Care Governance Team (PCGT) who gave consideration to:

### Prescribing Activity:

- How big is the 'problem'?
- How many prescriptions dispensed in the last 6 months?
- It is considered that we have large-scale prescribing of an unlicensed drug, of which there are many variations in both flower and oil forms.

### Training and Indemnity:

- Evidence of training for prescribing clinicians
- Evidence of appropriate indemnity for prescribing clinicians

### Clinical Governance:

- What clinical governance processes are in place to prevent risk to the patient and GP?
- What policies do the clinics operate within?

### Prescribing Guidance:

- What guidance is available to prescribers which details the potentials for interactions with other medications?
- Is this available to those GPs who haven't undertaken training?

### Medical Record Keeping:

- Do the clinicians have access to EMIS?
- If so, what platform do they use and is consent obtained?
- If not, how do they record their information? Including medical information and consultation details, consent etc.

### Patient Satisfaction:

- Is there a patient satisfaction survey?

### Clinical Review:

- What is the process regarding follow-ups?

### Best practice:

- Is there any guidance on best practice?

Following the planning meeting, States of Jersey Police also raised some areas of concern for consideration as part of this review. This included:

Is guidance given by prescribing clinicians to GP's to patients on the appropriate use of the prescribed medical cannabis, including warnings surrounding driving etc.?

Is there a possibility that cannabis cards be introduced to identify who is legally permitted to be in possession of medical cannabis produce? If not, is an alternative being proposed?

What are the guidelines around use of medical cannabis in public places such as open public areas, pub, clubs, restaurants and special events such as the Weekender and other large scale festivals?

What appearance does the prescribed medical cannabis have? Are there photographs or containers/vessels for administration by the patient that can be provided to law enforcement, to enable officers to distinguish between prescription products and illegally obtained products?

## PRESCRIBING ACTIVITY

In order to address some of the concerns raised regarding the practise of prescribing medical cannabis, it was agreed to undertake a review of the pharmacy data recorded during April 2021. The original intention had been to review the previous 6 months data but PCGT did not have the resource or capacity to support this large piece of work.

As with all private prescriptions dispensed in Jersey, data is presented to the Chief Pharmacist, detailing all medical cannabis products dispensed. In order to complete this review, the Chief Pharmacist shared the data for April 2021 with the PCGT.

The Primary Care Governance Lead combined all information into one Excel spreadsheet for ease of reference.

Consideration should be given to the transfer of handwritten records into electronic format. Due to variations in the quality of the handwriting, we cannot be certain that, in transcribing them into an Excel document, patient names will have been recorded accurately in all cases.

**It would be recommended that pharmacies recording private prescriptions manually, do so using capital letters to mitigate these inaccuracies.**

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## METHODOLOGY

All data was transferred into an Excel spreadsheet for ease of reference. This was a time consuming task given the volume of items dispensed but enabled filters to be applied to ascertain the data included in this document.

This review does not take into consideration those prescriptions which are issued and dispensed in the UK. The Chief Pharmacist has provided data on the number of CBPM Import Licences issued:

Year	Month	Licences Issued
2020	June	44
	July	111
	August	98
	September	130
	October	176
	November	128
	December	96
2021	January	62
	February	72
	March	101
	April	79
	May	77
	June	54
	July	68
	August	64

The average for June-December 2020 was 112 and the average for 2021 to date is 72.

As at 31 August 2021, the Chief Pharmacist confirmed approximately 1700 patients were accessing medical cannabis.

#### FINDINGS

A total of 2332 medical cannabis items were dispensed by Jersey pharmacies during April 2021. These items are currently dispensed by 2 pharmacies:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] There were 2 items dispensed where the prescribing clinician had not been recorded in the hand written data.

Notwithstanding the potential for inaccuracies in transcribing the handwritten data, there is no evidence to suggest that any patients are accessing more than one clinic.

There is a variation in both the doses prescribed and the frequency at which the items are dispensed between prescribers. This area has not been considered in detail.

Clinician	% of all items dispensed	Number of all items dispensed
[Redacted]	58.44%	1363
[Redacted]	6.56%	153
[Redacted]	3.73%	87
[Redacted]	0.77%	18

[Redacted]

Clinician	% of all items dispensed	Number of all items dispensed
[Redacted]	8.79%	205
[Redacted]	7.72%	180
[Redacted]	6.13%	143
[Redacted]	2.95%	69

[Redacted]

Clinician	% of all items dispensed	Number of all items dispensed
[Redacted]	4.76%	111

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## CONCLUSION

Of the clinicians currently prescribing medical cannabis, one is responsible for more than half of all items dispensed during April 2021. There is huge variation between the numbers of clinics held by each of the clinicians with this prescriber offering significantly more clinics than their peers.

## PRESCRIBING GUIDANCE

Official guidance to support medical cannabis prescribing is available online:

NHS England: [NHS England » Cannabis-based products for medicinal use](#)

GMC: [Information for doctors on Cannabis-based products for medicinal use - GMC \(gmc-uk.org\)](#)

The Medical Cannabis Clinicians Society: [How to prescribe medical cannabis | The Medical Cannabis Clinicians Society \(ukmccs.org\)](#)

MCCS guidance: [Recommendations-and-Guidance-on-Medical-Cannabis-under-Prescription-2nd-Edition-2020.pdf \(ukmccs.org\)](#) (a consensus statement from the executive committee of the MCCS hence not necessarily evidence-based or peer reviewed)

Canadian guideline for medical cannabis in primary care - [111.full.pdf \(cfp.ca\)](#) (evidence-based non-UK review/guidance)

National Institute for Health and Care Excellence (NICE): NICE Guidance NG144 Cannabis containing medicinal products:  
<https://www.nice.org.uk/guidance/ng144/chapter/Recommendations>



cannabisbased-medical-products-pdf

The guideline covers prescribing of cannabis-based medical products for people with intractable nausea and vomiting, chronic pain, spasticity and severe treatment-resistant epilepsy.

It additionally offers a baseline assessment tool:



baseline-assessment-tool-excel-6963875

Much of the guidance is in the context of NHS/UK law, which is more restrictive than Jersey. Prescribers should be aware that products prescribed in the local clinics do not have marketing authorisation so GMC guidance on use of unlicensed medicines should be followed.

In response to some concerns raised by GPs whose patients are taking a CBMP, Jersey's Chief Prescriber has shared a review of potential interactions between cannabis based medicines and other prescribed medicines. This will be shared with all general practitioners.



Cannabis-based-medical-products-po

RCGP and DDN, and others, are offering generic training to GPs who want to understand the benefits and complications of medical cannabis.

## TRAINING

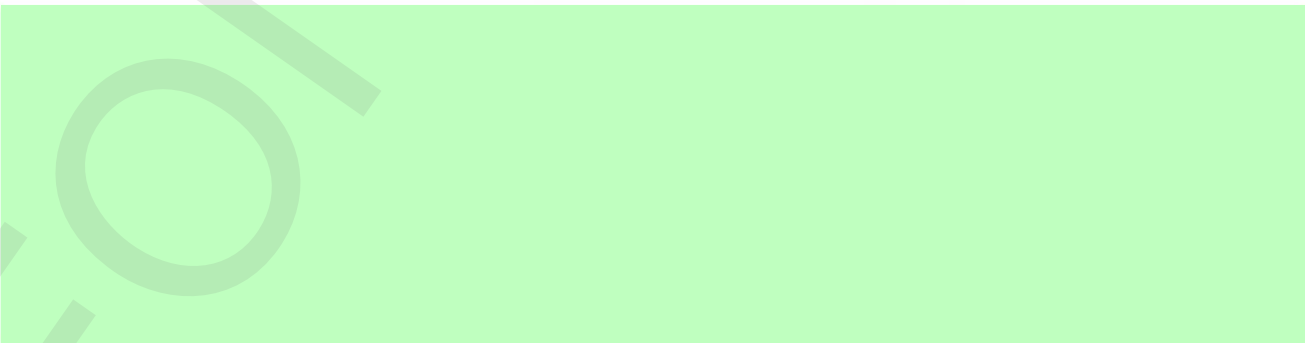
The training accessed by prescribing clinicians varies between the clinics:



## INDEMNITY



## CLINICAL GOVERNANCE





MEDICAL RECORD KEEPING



CLINICAL REVIEW



FOI 167263926

## PATIENT SATISFACTION

## BEST PRACTICE

There is little available in terms of Best Practice with a specific focus on medical cannabis. However, it remains that all registered medical practitioners should abide by the GMC's good Medical Practice in all areas of their clinical practise.

## CONCLUSION

It is clear that in the establishing of local clinics to deliver medical cannabis services, there is no consistency in the training provided to practising clinicians. This makes it difficult to determine whether appropriate training has been undertaken. Additionally, there is little information on the requirement, or otherwise, for continuing professional development in this area. Where possible, a list of approved training programmes should be developed to ensure consistency in the quality of the training accessed. Consideration may also be given by the local Responsible Officers around the requirement for inclusion in annual appraisal.

Of the clinicians currently offering the service locally, most are already based in Jersey and are registered with the Jersey Care Commission either as GPs or other medical practitioners.

Further consideration needs to be given to how prescriptions are provided: are these posted from the UK or are they being countersigned by local GPs?

Inconsistencies continue with how patient information is stored

Reassuringly, all clinics are reporting that prescriptions will not be issued until sufficient consideration has been given to the benefit of medical cannabis for each individual patient, with multi-disciplinary team discussions and case discussions happening regularly.

Of some concern is that only one clinic has confirmed that consideration to prescribing will be only be taken upon receipt and review of the medical history of the patient. Although individual clinicians have advised that they liaise directly with the registered GP and consider medical cannabis as a 'last resort' in terms of medication.

## RECOMMENDATIONS

1. Pharmacies move wherever possible to electronic recording of prescriptions dispensed. If not possible, consider documenting using block capitals to ensure accuracy in any transcribing. **This has been completed and from September 2021 all pharmacies will submit data electronically.**
2. Develop a local governance structure that considers the framework in which medical cannabis is delivered to ensure consistency across the services.
3. Introduce licensing conditions for any medical cannabis prescriber to engage with a local Responsible Officer (whether that be the RO for Primary Care or the RO for secondary care).
4. Introduce licensing conditions for any medical cannabis clinic to make available to the RO copies of all policies, procedures, processes, as well as confirming how sensitive, clinical information will be stored and used.
5. Detailed annual reviews of a sample of all items dispensed by pharmacies.
6. Create a central resource which collates information on all patients prescribed medical cannabis.
7. Implement robust data sharing agreements.
8. Require written consent from all patients to enable appropriate data sharing.
9. Implement an education programme for non-prescribers of medical cannabis in order that understand and appreciate the potential benefits/pitfalls of medical cannabis for their patients.
10. Ensure all clinicians are including medical cannabis in their scope of work for presentation at annual appraisal.

[REDACTED]

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**From:** [REDACTED]@gov.je>  
**Sent:** 19 May 2025 10:44  
**To:** Barbara Ward; [REDACTED]  
**Cc:** Tom Binet; Rose Binet; Andy Howell  
**Subject:** RE: Aide memoire from 14th & 16th May team meetings  
**Attachments:** [REDACTED]

Hi Barbara

Thank you for your helpful Aide Memoire. Please find my comments below.

As always, please let me know if there is anything else I can assist with.

Many thanks  
[REDACTED]

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**From:** Barbara Ward <B.Ward@gov.je>  
**Sent:** 18 May 2025 19:32  
**To:** [REDACTED]@gov.je; [REDACTED]@gov.je>  
**Cc:** Tom Binet <T.Binet@gov.je>; Rose Binet <R.Binet@gov.je>; Andy Howell <A.Howell@gov.je>; Barbara Ward <B.Ward@gov.je>  
**Subject:** Aide memoire from 14th & 16th May team meetings

Dear [REDACTED] and [REDACTED]

Aide memoire list from our Team meeting/s on 14<sup>th</sup> & 16<sup>th</sup> May.

### General Action Items

**Items for discussion with Ruth**

1. Emis / Cannabis Clinic data collection Regulatory matter and Primary Care Body to be consulted—Prospective data from Mental Health re number of patients who have been affected by the prescribing of Medicinal Cannabis being collated. Policy officer & RB leading
2. Discuss Medicinal Cannabis prescribing and NICE guidelines. Recruitment of Policy Office being looked at by CEO

Hope this is helpful

Kind regards

Barbara  
Deputy For St Clement

[Redacted]

**From:** [Redacted]@health.gov.je>  
**Sent:** 07 March 2025 14:18  
**To:** Simon West; GERADA, Clare (NHS PRACTITIONER HEALTH); [Redacted]; [Redacted]  
**Subject:** RE: Comments on cannabis prescribing at HCS board

Dear All,

Thanks for the information.

[Redacted]  
[Redacted] My understanding is that there is no regulation of the clinic or any of these activities – however, [Redacted] will be able to advise further on this.

[Redacted]

Happy to discuss further.

Kind Regards

[Redacted]

[Redacted]  
Chief Pharmacist

Office of the Chief Pharmacist | 4<sup>th</sup> Floor | 28-30 The Parade  
| St Helier | JE2 3QQ



[Redacted]  
**From:** [Redacted]@health.gov.je>  
**Sent:** 10 June 2025 09:34  
**To:** [Redacted]  
**Subject:** FW: Comments on cannabis prescribing at HCS board

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**From:** [Redacted]  
**Sent:** 07 March 2025 14:18  
**To:** Simon West <S.West@health.gov.je>; GERADA, Clare (NHS PRACTITIONER HEALTH) <clare.gerada@nhs.net>; [Redacted]@health.gov.je>; [Redacted]@carecommission.je>  
**Subject:** RE: Comments on cannabis prescribing at HCS board

Dear All,

Thanks for the information.

[Redacted]  
[Redacted] My understanding is that there is no regulation of the clinic or any of these activities – however, [Redacted] will be able to advise further on this.

[Redacted]  
[Redacted]  
Happy to discuss further.

Kind Regards

[Redacted]  
[Redacted]  
Chief Pharmacist

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| St Helier | JE2 3QQ



**Health and Care  
Jersey**

**From:** [redacted]@health.gov.je>  
**Sent:** 10 June 2025 09:46  
**To:** [redacted]; Simon West; [redacted]  
**Cc:** GERADA, Clare (NHS PRACTITIONER HEALTH)  
**Subject:** [redacted]  
**Attachments:** RE: Comments on cannabis prescribing at HCS board (24.1 KB)

Dear All,

In summary, my oversight covers the supply, storage, and distribution of medicines through registered pharmacies and wholesale dealer's licences. Therefore, I'm responsible for the regulation of [redacted], both of which are formally registered entities. Based on current information, I have no regulatory powers over the clinical activities of private clinics such as [redacted] unless the conduct of a registered pharmacist is involved.

To clarify:

- I have no formal powers to regulate medical or aesthetic clinics, nor their clinical protocols.

Please don't hesitate to get in touch if it would be helpful to talk this through.

Kind Regards

[redacted]  
Chief Pharmacist

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**Health and Care  
Jersey**

**From:** [redacted]@health.gov.je>  
**Sent:** 10 June 2025 08:47  
**To:** Simon West <S.West@health.gov.je>; [redacted]@carecommission.je>  
**Cc:** GERADA, Clare (NHS PRACTITIONER HEALTH) [clare.gerada@nhs.net](mailto:clare.gerada@nhs.net); [redacted]

[redacted]@health.gov.je>

Subject: [redacted]

Thanks Simon,

Yes just to stress this is not primary care it is [redacted]

[redacted]. The Doctors working in this are not under either Simon or myself, they have UK RO alignment.  
Hope this helps

Medical Director and Responsible Officer Primary care

Email [redacted] [@health.gov.je](mailto:s.west@health.gov.je)

Tel; [redacted]



Health and  
Community Services



Health and  
Community Services

From: Simon West <[S.West@health.gov.je](mailto:S.West@health.gov.je)>

Sent: 09 June 2025 15:58

To: [redacted] <[\[redacted\]@carecommission.je](mailto:[redacted]@carecommission.je)>; [redacted] <[\[redacted\]@health.gov.je](mailto:[redacted]@health.gov.je)>

Cc: GERADA, Clare (NHS PRACTITIONER HEALTH) <[clare.gerada@nhs.net](mailto:clare.gerada@nhs.net)>; [redacted]

[redacted] <[\[redacted\]@health.gov.je](mailto:[redacted]@health.gov.je)>

Subject: [redacted]

Dear [redacted]

Sorry I was off island last week and saw your e mail on this

The details we discussed are

[redacted]

*Like most of the Doctors working in Cannabis businesses we have no oversight on them.*

[redacted]

Hope that helps

Simon

**Mr.Simon West. MB BCh, FRCS (Edin), FRCS (TR&Orth).**

Consultant In Orthopaedics

Group Medical Director

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