

Your ref: MS:25554
Our ref: PL3/COR011/3970/JSA
Contact: Jordan Sacco
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Crown Law

Department of
Justice

17 December 2025

Mr Michael Scherini
Principal Lawyer
Scherini Lawyers
[REDACTED]
[REDACTED]

Dear Mr Scherini

Letters concerning prisoner telephone tariffs

I refer to your letter dated 18 November 2025 (your letter) to Commissioner Paul Stewart APM, the chief executive of Queensland Corrective Services. Your letter indicated that, amongst other things, your client, EPC Operations Pty Ltd (EPC Operations), requested a statement of reasons under pt 4 of the *Judicial Review Act 1991* (JR Act) in relation to the decision to change telephone tariff rates for prisoner calls.

I also refer to my subsequent letter to you dated 25 November 2025. In my letter I requested EPC Operations provide information setting out how its interests have been adversely affected by the purported decision. This information would allow the Commissioner to consider whether EPC Operations is a person aggrieved for the purposes of pt 4 of the JR Act.

I confirm no further information has been provided to establish that EPC Operations is aggrieved by a change in telephone tariff rates for prisoner calls.

Request for a statement of reasons

Our client is not satisfied that EPC Operations is a person aggrieved by the Commissioner's decision to set telephone tariff rates for prisoner calls. Consequently, our client does not consider that EPC Operations is entitled to a statement of reasons under pt 4 of the JR Act.

However, our client has agreed to provide the following information in the interests of resolving your queries.

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Telephone tariff rates for prisoner calls

It is an offence under s 52A(a) of the *Corrective Services Act 2006* (CS Act) for a prisoner to make a personal call knowing the call will be diverted to allow the prisoner to contact someone other than an individual approved for personal calls by the prisoner. It is also an offence for a prisoner to intentionally continue with a personal call the prisoner knows is diverted or that allows the prisoner to contact someone other than an individual approved for personal calls by the prisoner (s 52A(b)).

The offences contained in s 52A of the CS Act commenced on 2 June 2025, following the commencement of amendments made by the *Corrective Services (Promoting Safety) and Other Legislation Amendment Act 2024*. The explanatory notes to the Amendment Act indicate that some prisoners use the Prisoner Telephone System (PTS) for nefarious purposes, such as circumventing Queensland Corrective Services (QCS) controls in order to contact domestic and family violence victims or cause other harm to members of the community through unlawful behaviour. This occurs through the use of third-party redirection services which allow prisoners to contact members of the community without the member of the community providing their contact number.

As a result of the changes to the CS Act noted above, QCS approved a variation to the PTS contract which included a new flat rate tariff for all mobile, local landline and national STD calls. The flag fall is 15c and the rate is 20c per minute. Calls to remote areas are 30c per call. While this represents an increase in local landline and National STD calls, calls to mobiles are now significantly cheaper.

The new flat rate call tariff was introduced to:

- address ongoing prisoner and stakeholder concern that call tariff rates were too high;
- ensure QCS remains compliant with recommendations from the *Hear Her Voice* reports concerning prisoner call rates;
- remove financial incentives for prisoners to use redirection services contrary to the new offences in s 52A of the CS Act;
- highlight to intelligence teams prisoners who continue to use redirection services; and
- minimise the operational impact of blocking redirection services, as prisoners' use of the services decreases.

In considering whether to vary the PTS contract, a human rights assessment was undertaken pursuant to s 58 of the *Human Rights Act 2009*. The assessment concluded that while the variation to the PTS contract may engage or limit prisoner's human rights, any limitation is reasonable and justifiable.

Finally, the new tariff rates do not remove a prisoner's ability to communicate with family, friends, legal representatives or kinship ties. To the extent that a prisoner's ability to communicate with member of the community is inadvertently impacted or limited, this is mitigated by a decrease in rates for calls to mobiles. A 5-minute call to a mobile is now 36% cheaper than under the previous rates. Calls to remote areas remain at 30c per call.

I trust this information satisfies your queries. Please be advised that at this stage, QCS does not intend to take any further steps in response to your letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Sacco', is positioned above the typed name.

Jordan Sacco
Senior Principal Lawyer
for **Crown Solicitor**