

NSW FREEDOM OF INFORMATION

- Collective Regulatory Abhorrence for Protocol

CRAP Policy

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1. Introduction

NSW Freedom of Information (NSW FOI) is a free community service launched in October 2021 during the NSW Information & Privacy Commission's (IPC) Right to Know Week.

The service is focused on assisting the public to understand and navigate Access to NSW Government Information processes, endeavouring to meet the needs of the general public particularly those who are not legally qualified.

The service also exposes corruption of the legislation by public servants and misconduct in general.

NSW FOI is operated by (1) one full time volunteer.

The service recognises the public's need for access to information processes which are not framed in a way that is biased towards NSW government agencies.

The IPC is the regulatory body for the relevant legislation the Government Information (Public Access) Act 2009, or GIPA. In March 2026 the IPC released its policy IPC Unreasonable Conduct by a Client Policy. It is founded on the NSW Ombudsman's Managing Unreasonable Complainant Conduct Policy.

Clearly the IPC has now expanded the Ombo's policy past being relevant to a complainant, and now has its own policy to pretty much extend to every member of the public whether or not they've lodged a complaint!

However, case after case of administrative reviews both internal and external to the IPC arena sees decisions which are biased towards government agencies, and which therefore do not align with propaganda attesting to uphold the public's legislated rights to access NSW government information.

Such cases also deny the propaganda circulated by every IPC Right to Know Week.

It is also nigh impossible to get an investigation into any NSW government agency acting in breach of the legislation. This is a dirty job the IPC shy's away from.

Additionally, the Information Commissioner cherry-picks which cases she will make an 'appearance' at within administrative review and judicial proceedings in the NSW Civil & Administrative Tribunal (NCAT) arena, revealing who she actually supports and what agenda she actually pushes.

To date the IPC has 'appeared' at some cases concerning in particular the GIPA Act 2009 Section 110 Restraining Orders, but choosing to remain invisible to some others; leaving those Respondents defenceless against agencies seeking such orders.



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Clearly there is discretionary power available to the Information Commissioner however at this point in time choosing which cases appeal to her result in prejudicial, discriminatory decisions directly affecting the general public.

These attitudes towards the public are not isolated to the IPC but extend across the breadth of NSW government, with agencies responding to the public's legitimate enquiries, requests for information, and formal complaints with procrastinating and dismissive statements, little to no action, and the compilation of dossiers which are later used against the public in their endeavours to interact with its government.

NSW FOI values accountability, provision of services, a proactive methodology and organisational culture, rightfully expecting public servants can be trusted to act honestly, impartially, transparently, and with total integrity.

NSW FOI chooses to stand with the general public and expose corruption and maladministration of the legislation by agenda-driven public servants.

NSW FOI has obtained numerous evidence NSW government agencies routinely abuse mechanisms designed for problematic individuals, but which are broadly and unnecessarily applied as a go-to management strategy against those with the courage to ask questions and seek redress.

Currently, the primary policy of reference for the NSW government in dealing with the public, which is not legislated or mandatory, is the Model Policy for Managing Unreasonable Conduct by a Complainant (UCC) courtesy of the NSW Ombudsman, and the public applauds the collaboration of all Australian Ombudsmen on this project and the use of public monies to do so.

The research study supporting the UCC policy was commissioned by the NSW Ombudsman with data cherry-picked to suit the project goals. So yes, applause all 'round to those involved in this project against the public interest. Information released to NSW FOI concerning this project disclose Ombudsman staff personally chose which files and information to give to the Research Team..... Seriously?!

More on this commissioned 'research study' here,
<https://nswfreedomofinformation.net/creating-a-moral-panic/>.

Agencies claim reliance on this policy ensures fairness and consistency however this policy is often the first step for an agency intent on obstructing due process.

It is the abuse of the UCC Policy by NSW government agencies which has resulted in the development of this CRAP policy which impartially extends to all NSW government agencies.

Examples of public servants administering CRAP to the public will be included in this document.



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Evidence public servants do not tolerate CRAP within respective departments will be welcomed and published as a matter of public interest.

This document is totally frank and is based on documented occurrences of CRAP routinely dealt by public servants within the NSW government.

This document has been compiled by the Site Administrator of the website www.nswfreedomofinformation.net, Telina Webb.

Any enquiries about CRAP can be directed to Telina Webb at info@nswfreedomofinformation.net.

This CRAP policy document will be published on the website www.nswfreedomofinformation.net.

This CRAP policy encompasses satirical commentary and personal opinions and is open to change at any time.

This CRAP policy is supported by the CRAP Governance and Administrative Efficiency Act 2026, available here, <https://nswfreedomofinformation.net/crap-act-2026/>.

The reader is referred to the Ministerial Press Release “Government Announces Landmark CRAP Reform Delivering “unprecedented Administrative Coherence”, May 2026, available here, <https://nswfreedomofinformation.net/media-release-18-may-2026/>.

Additional reference is made to an excerpt of Parliamentary Debate transcript, May 2026, available here, <https://nswfreedomofinformation.net/media-release-ministerial-debate/>.

2. Objectives

CRAP Policy Aims

This policy has been developed to assist the general public to better understand the available options for coping with and responding to bureaucratic CRAP.

It aims to support the public’s endeavours to:

- Identify CRAP
- Cope with CRAP
- Respond to CRAP
- Share individual accounts of CRAP
- Access support when subjected to CRAP
- Report CRAP



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3. Defining CRAP

CRAP is defined as the acronym for Collective Regulatory Abhorrence of Protocols.

CRAP comes in many forms.

It is a tangible phenomenon created by public servants for the purposes of responding to numerous categories of interaction between them and the public they serve.

CRAP comes in many forms including but not limited to:

- Verbal responses to enquiring members of the public
- Written responses to enquiring members of the public
- Covert communications between agencies concerning members of the public
- Defences to complaints submitted by members of the public
- Formal responses to the public's endeavouring to access beneficial legislation
- Submissions and Sworn Affidavits in legal proceedings responding to members of the public
- Manipulating legislative outcomes to the detriment of the public

CRAP is public facing. It is a public servant response and is generally justified by incorporation into policies and procedures, with often no avenue of review for a perplexed member of the public who didn't see the oncoming CRAP.

The first signs of CRAP are usually at an Agency Service Counter foyer or a telephone message opening a call to a government agency.

A typical sign in an Agency foyer may contain dialogue such as:

“Please treat our staff with respect. Abuse or bullying of any kind will not be tolerated. Aggressive behaviours will not be tolerated and you may be removed from the premises.”

An auto-answering on a department phone may imitate such statements with a warning the call could be terminated at any time.

This is an immediately defensive posture by our public servants, who want to make clear they are in control and maintain the balance of power, much like a funnel web spider in its position of attack.

It also assumes every person they interact with is already cheesed-off and has some history of frustration with the agency due to coming face-to-face with bureaucratic CRAP.

These first public encounters with CRAP show the dialogue is one-sided, and the public has no rights of equal treatment; that is to say the public appear to have no rights to fair, civil, courteous treatment, with interactions rightfully terminated should they have the misfortune to interact with a public servant with an unprofessional or accusing attitude likely sick and tired of wallowing neck-deep in CRAP.



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Initially the public may find public servants appear to be helpful, considerate and at times proactively inquisitorial in efforts to ascertain what level of customer service is sought or what problem has prompted contact.

But the public are warned this is a ruse!

This is now recognised as a risk assessment, where the public often sees public servants shutting down enquiries with CRAP statements such as:

- I don't know
- This is not our role
- Put it in writing
- My Manager's not available right now
- My Manager's in a meeting for the remainder of the day
- We don't give legal advice
- Seek legal advice

Such statements are designed to dissuade concerned members of the public from proceeding further and snugly fit the definition of CRAP.

These types of statements can also be followed with:

- If you don't calm down I'll terminate this call
- If you don't calm down you will be asked to leave
- If you don't calm down I'll get my manager
- A letter formally warning of impending restriction of access to government services
- A letter formally restricting access to government services
- Restriction of methods of contact
- A letter banning the public from government premises
- Blocking social media
- Formal intervention by a Sherriff or Security Guard
- Formal intervention by NSW Police

But members of the public do not need to act inappropriately for these kinds of CRAP to be invoked.

Public servants also enact more CRAP when members of the public act with due diligence and follow up on outstanding matters or correspondence.

Such dissuasion and control strategies are recognised as and define CRAP.

CRAP also extends to any category of litigation involving NSW public servants.



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In the NSW Civil & Administrative Tribunal (NCAT) for example, members of the public have found themselves under the control of a Guardian Ad Litem; an agent appointed by NCAT which purports to represent a member of the public and act in their best interests, but which generally acts in relationship with the NCAT itself, effectively providing NCAT and the party agency what it desires in the proceedings. This is known as demoralising and controlling CRAP.

Public servants also serve up a good helping of CRAP to those exercising their legislated rights to access NSW government information via GIPA Act 2009 Section 110 proceedings; a punishment concept likely dreamt up some time during the Spanish Inquisition.

Section 110 proceedings are a formal restraint order agencies work very hard to secure which is designed to humiliate members of the public and frustrate their legal rights.

A Section 110 Order is highly prized, and those agencies successful in securing one are seen as administrative heroes and role models of the public service sector.

Such proceedings make clear the claim the public has a legally enforceable right to access government information is total unequivocal indisputable CRAP.

Those who initially believed in the justice system when dealing with public servants, but who have been repeatedly disappointed to realise justice is out of reach of ordinary citizens, may find continued court petitioning for much-needed action and redress responded to with Supreme Court proceedings as a Vexatious Litigant with their name on a public register, effectively publicly shaming an individual, much like being permanently placed in the stocks in a public marketplace and the padlock keys being lost.

Such policies, procedures and pieces of legislation are created by government solicitors who make recommendations to Parliament by agenda-driven public servants with the full intention of controlling the majority of the population, being those outside of the government circle of trust.

Generally, the stakeholder engagement which supposedly includes public participating in legislative review or amendment is usually weeded out by public servants intent on ensuring one clear agenda is pushed to fruition. Agencies collude in close parallel to make carefully crafted submissions which are welcome with open arms by those forming the Parliamentary reports. In one such instance of legislative review, the GIPA Act 2009 in 2014, (57) fifty - seven Local Councils colluded to push for legislative change to the detriment of the public, which was totally successful.

Each of these examples qualifies as ultimate serious bureaucratic CRAP.



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4. Roles and Responsibilities

Despite the copious amount of departmental policies and procedures, there is nothing currently available which sets out the public's rights.

To date it's all about the rights of public servants.

Yes the public has the GIPA Act 2009, the PPIP Act 1998, but they don't have any actual value. It's Token Legislation.

When a member of the public refers a public servant to their roles and responsibilities, this can see a huge pile of CRAP hurled in their direction to dissuade, stop, punish, humiliate and frustrate access to government services and beneficial legislation.

In this regard it is the role and responsibility of each and every member of the public to take the following actions:

Document:

Accurately diarise what has occurred noting the offenders name and position. It is important to note the date and time and any relevant notes including purpose of interaction, outcomes sought, and agency response(s).

Support:

Refuse to suffer CRAP in isolation. Find support; in the immediate family, between colleagues, with friends. It may also be helpful to source relevant groups on social media and have an open, frank conversation about the CRAP you've been subjected to.

Share experiences:

It is extremely important public servant CRAP is fully exposed. This is what is known as 'equal billing' where members of the public act in like-fashion to public servants, naming and shaming them as they do to the public they serve. Building a website and exposing CRAP, ensuring you have documentation and / or evidence in support, can be empowering and help you cope with CRAP more readily once you feel you have a voice.

Lobby:

Current published information on the NSW Parliamentary website states the parliament is accessible to the public.

Is that right?!

In that case, write, write, write, write, and keep on writing to the Parliament, to the Parliamentary Committees, to the Members of Parliament directly.



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Petition for meetings.

Present the evidence.

Identify what's wrong.

And seek a Parliamentary Inquiry and / or Royal Commission.

5. Responding to CRAP

Apart from speaking out and exposing CRAP publicly, or petitioning your Parliament, you should exercise all your rights to complain about CRAP, including making reports to the Independent Commission Against Corruption for extremely serious criminal CRAP.

You do need to be aware agencies engage in CRAP behaviours, breaching your privacy and telling CRAP stories about you behind your back, but don't let that dissuade you!

Agencies have all sorts of policies and procedures attesting to a zero-tolerance attitude to CRAP, so don't hesitate to push those boundaries and test the validity and integrity of these.

Search terms for such CRAP policies can include descriptors such as 'ethical', 'ethical standards', 'ethical conduct', 'code of conduct', 'fraud and corruption', 'customer service charter', things like that.

In addition to contacting the agency that served up the CRAP, which is propagated to be the first line of action, consider writing to the relevant Minister or Regulatory Body.

One thing to bear in mind of course is the current status quo on the Government Information (Public Access) Act 2009, GIPA, which is the State's freedom of information legislation.

ALL, yes ALL, documents pertaining to complaints or investigations of any kind are protected under GIPA, Schedule 2, as Excluded Information.

This means the NSW government is not required to release any document or record to substantiate it has afforded any complaint or report due process, which is another whole other pile of CRAP.

Which leads this policy to the next Section, the NSW Right to Information & Privacy Practitioners' Network, NIPPN.



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6. NSW Right to Information & Privacy Practitioners' Network, NIPPN

This is a real BIGGY!

This is perhaps the biggest cesspool of CRAP in the state of New South Wales.

It is a state-wide cartel which operates as a collective to undermine the legislation and the public's rights to access NSW government information and have personal information fully protected.

According to its founder Phillip Youngman of Youngman Consultancy, it has been 'operating' for over (2) two decades.

Over the years NIPPN has become extremely influential with direct contact and input with the NSW Ombudsman, and now the NSW Information & Privacy Commissioners. NIPPN also has direct ongoing access to the NSW Crown Solicitor (CSO) and NCAT. In fact it's the CSO who 'educates' NIPPN on how to deal out copious amounts of CRAP when responding to the public's access to information applications. Requests for access to these educational materials has seen a fierce CRAP-fight between the CSO and the public as it continues to hide its activities with NIPPN.

As at the date of this CRAP Policy NIPPN has a confirmed membership of approximately (400) four hundred.

There is substantial evidence, emanating from NIPPN itself, that it resents the public's rights and works very hard to trample on the public's beneficial legislation.

Initially having a website and publishing basic information about its activities including Minutes of Meetings, it went underground in 2024 further to scrutiny from NSW FOI.

The IPC has stated NIPPN no longer operates but this is false, as NIPPN's Consultative Committee still regularly accesses both Commissioners; something that is denied the general public.

Of significant notoriety is one of its key members Jodie Cobbin, Dept of Communities & Justice' Director / Business Unit Manager Open Government Information & Privacy Unit (that's a crappy mouthful) who propagated her own personal strategy on how to deal out her own measure of serious CRAP to the public, sharing that propaganda at a public meeting at NSW Parliament House in March 2019; public meeting because individuals from private enterprise were in the audience. Cobbin's presentation included the personal information of a member of the public. Not a good look Ms Cobbin.....



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Cobbin just might be the current CRAP Champion, as she also falsely claimed a departmental study required her sister agencies provide her with damning information about the public. Of course this was just a dossier-compiling exercise which should not be a surprise as she is an ex-NSW Police Superintendent.

See much more about NIPPN here, <https://nswfreedomofinformation.net/all-about-nippn/>, including the list of agency members.

As at the date of this CRAP policy no person has disputed the published information about NIPPN.

NIPPN is crucial to the anti-access to information machine of the NSW government, where members work as a collective.

Make no mistake; your Access Applications and personal information is blatantly shared between NIPPN members under the prep-school premise of Chatham House Rules, which incidentally has been debunked by the NSW Attorney-General, but which has not stopped NIPPN members continuing to rely on it. Chatham House Rules means everyone can share whatever information they want to and nobody will identify the offender or make any due report.

Let's get that into perspective: any NIPPN member can share whatever government information they want to and there are no ramifications or accountability. Yes, members include the ICAC, NSW Police, the IPC, Justice NSW, Crown Solicitor. So incestuous.

NIPPN is a huge scam on the NSW public who blindly believe in the legislation, where public servants swim in a huge pool of CRAP to justify their actions.

As such NIPPN members are viewed as a cartel of CRAP.

They effectively operate as a cartel as part of their everyday roles and responsibilities.

They use legislation, policies and procedures to hide their behaviours and conduct.

They are well-versed and equipped to abuse the public's rights.

7. Key CRAP Examples

In addition to that stellar example of CRAP by Ms Jodie Cobbin is the latest decision by the Independent Commission Against Corruption which has refused to investigate Port Stephens Council's acts of fraud and extortion against members of the public. Port Stephens Council's Governance Manager (no it's no joke) is now infamous for the ongoing serious CRAP he has personally and continuously dished out to the author of this document and her husband.



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At the date of this publication Port Stephens Council's Mr Tony Wickham, Justice NSW's Ms Cobbin and the ICAC's Mr Fiorini jostle for first place. It's anybody's guess who will take out the top CRAP prize!

Likewise, the IPC has not investigated Port Stephens Council for acting in contravention of the GIPA Act 2009 by not making a list of its Open Access Information Mandated for Release, public (go figure.....).

And let's not forget the recent case of Cobbin's department (DCJ) colluding with Port Stephens Council (PSC) and Goulburn Mulwaree Shire Council (GMC) (do we see any patterns of behaviour here?) to secure a Section 110 Restraint Order under the GIPA Act 2009 against the author of this document, her husband, and her husband's business, in perpetuity and applicable right across the state.

Mr McEwan and his company were falsely drawn into the proceedings as DCJ, PSC, and GMC colluded to scoop them up in the same net-of-convenience.

Okay, sorry, this last one just might take the CRAP cake. At the publication date of this CRAP policy that Section 110 matter is under appeal.

8. Closing

By now the reader will have a better understanding of the CRAP the NSW public is expected to wade through and absorb.

It also makes clear these instances of CRAP are not isolated or infrequent.

And it seems there is no CRAP too big or too deep to hurl at those who simply speak up and stand up.

The author of this CRAP policy firmly believes the only way to eradicate bureaucratic CRAP is to document, report, and expose it.

Every time.

Publicly.

CRAP is not something we should resign ourselves to.

It takes just one good manager to stem the flow of CRAP, change the culture of CRAP.

Just one. The author of this CRAP policy continues her search for such a manager.



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