

Made on Behalf of:	Defendant
Surname and Initials:	Carrie Goodwin
Statement Number:	First
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Date Statement Made:	30 November 2017

IN THE HIGH COURT OF JUSTICE  
CHANCERY DIVISION

CLAIM NO: HC-2016-002849

B E T W E E N:

SIR CLIFF RICHARD, OBE

Claimant

AND

(1) THE BRITISH BROADCASTING CORPORATION

(2) THE CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendants

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WITNESS STATEMENT OF CARRIE GOODWIN

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I, **Carrie Goodwin**, care of South Yorkshire Police, Carbrook House, 5 Carbrook Hall, Sheffield, S9 2EH **will say as follows:**

1. I am the head of corporate communications at South Yorkshire Police ("SYP"). I joined SYP in December 2013 and until March 2014 my work was largely focused on the Hillsborough inquests. After this time I moved into role as head of corporate communications. Prior to joining SYP I worked for the Probation Service as a public relations and information assistant. I then worked for West Yorkshire Police as a campaign office for their Anti-Drugs Campaign and then became a press officer for West Yorkshire Police's Leeds District. After this I became the Area Communications Manager for the Crown Prosecution Service.
2. The corporate communications team's role is to provide a proactive and reactive service to SYP to enable it to deal with local, regional, national and international media. My team assist with investigations by publicising appeals and wanted or missing people. We also promote the good work done by SYP across the local districts and on a force-wide level. The team provide updates on incidents and police operations through

traditional media channels, such as press releases and images. We also use social media channels such as Facebook and Twitter.

3. When I joined SYP I became aware from discussions with colleagues and the senior command team that relations with the media could be improved. The perception was that the SYP media team was too reactive and lacked sufficient planning which meant that often information was being put out too late to be of any use to the media. For example, court dates were often provided after the hearing had taken place. When I was at the CPS I worked in partnership with SYP and this had been my experience. So when I became head of corporate communications I began to take steps to change this. The intended outcome was to help the media team to get on top of day to day media queries about things like court dates and free them up to focus on public relations work such as getting good news stories out, publicising campaigns and human interest items.
4. There had also been some new personnel joining the media team and so I wanted to ensure that they were familiar with the journalists who were likely to be covering high profile matters such as Hillsborough. It was with this in mind that I emailed Dan Johnson on 28 April 2014 to invite him in to SYP to meet some of my colleagues. This offer was made to several other local reporters who were likely to be in regular contact with the media team. A copy of this email is exhibited to my witness statement as "Exhibit CG1".
5. I have been shown a copy of Dan Johnson's email of 19 May 2014 describing his meeting on the same day with Helen Hall and Hayley Court, which is exhibited to this witness statement as "Exhibit CG2". I am not sure if his comment, "*happy to tip us off about officers likely to have interesting contributions*", is his interpretation of what was said but I would not have expected Hayley to make an offer in those terms. However, I consider that Dan is a good journalist.
6. About a month after I moved into the role of head of corporate communications I was informed by Matt Fenwick about the investigation into Sir Cliff Richard. I was briefed about all the high profile cases in SYP. At this time it was very much up in the air whether the investigation would

come to SYP. There was certainly no plan for it to go anywhere near the media. I don't remember any further briefings and the next trigger for me was when I found out that the investigation was formally with SYP. I think this was in late June or early July. This was the stage when I would usually start to put together "if asked" line because there is always a point at which an investigation moves from being covert to potentially becoming overt. The "if asked" line is never volunteered to the media but is provided in the event that the media becomes aware and contacts SYP.

7. I heard from Dan Johnson on 8 July 2014 when I received an email from him asking me to call him about a few matters he wanted to discuss with me. A copy of this email is exhibited to this statement as "Exhibit CG3". I cannot remember if I called him or he called me but we spoke either on 8 or 9 July 2014 when we discussed various matters.
8. During the telephone conversation we discussed a number of other cases and then Dan said that he was aware that SYP was investigating Sir Cliff Richard. I was shocked when he said this because the investigation was at a very early stage and only a limited number of people within SYP knew about it. Dan knew what the allegation was and went on to provide more details than I was aware of including the approximate age of the victim, the location and event at which the alleged offence occurred and that it had occurred in the 1980s. What surprised me most was that he was clear that the source of his information was Operation Yewtree. Press are not normally like this. He relayed to me a conversation he had had with his source who had said, "You cover Sheffield don't you?" before revealing the details of the allegation against Sir Cliff Richard. Dan had told me detailed information about the allegation and it appeared to me that he was seeking a comment from SYP which led me to believe that he was ready to publish the story straight away. I said to him that I would have to look into it.
9. I recall that I spoke to Matt Fenwick after this and explained what had happened. Shortly after this I went to speak to the Chief Constable, David Crompton, about the approach from the BBC. I am not sure of the exact date on which I went to speak to him but it would have been sometime between 9 July and 11 July 2014. I cannot remember if I decided to do this myself or if Matt had suggested it. I recall that I went into the Chief's

office and spoke to him about it. It is in the nature of my job that I need to speak to the command team at short notice and they will usually make time for me.

10. I knew that the Chief knew about the investigation and I told him about my conversation with Dan Johnson. He never reacts big to things but I could see that he was concerned about it and he was focusing on what it meant for SYP. We spoke about the risk to the investigation which could arise if Sir Cliff Richard knew he was being investigated and what he might do with the evidence. Normally, you would not name a suspect until charge and we talked about the possibility that the BBC could or would name him. We discussed the privacy implications for Sir Cliff Richard if he was named and although we discussed human rights our conversation was more about the implications of him knowing than the public knowing. I had referred to McNae's essential guide to journalism and the College of Policing guidance and we worked through this during our discussion. We concluded that the situation we faced was not covered by the guidance because it didn't deal with the situation where a journalist comes to you with a name.
11. We discussed the possibility of giving the BBC a pre-recorded interview but the problem with that option was that it gave over control of the situation to the BBC. We could not have brought the search forward because I knew from discussions with Matt that the search was not ready to go. We may have discussed giving the BBC a date for the search and then actually carrying out the warrant prior to that date, but this was never given serious consideration as this would have damaged relations with the BBC. Eventually we decided there were two options – either giving the BBC a pre-recorded interview or briefing Dan Johnson about the search warrant. We did discuss the idea of refusing to cooperate with the BBC but we discounted it because we thought that he would run with the story anyway.
12. I am not quite sure how long the meeting lasted but I would have thought it was at least half an hour because we did cover quite a lot of ground. I did not take a note of the discussion at the time but later on I made a brief note summarising it. The note doesn't reflect the time we spent discussing the options or the level of detail we went into.

13. On 11 July 2014 I emailed Matt Fenwick to update him following my conversation with the Chief. I explained that the Chief had agreed that the BBC could be briefed about the search prior to it taking place he did not want the BBC to accompany SYP on the search. Before I emailed Matt I had prepared a draft statement regarding the planned search of Sir Cliff Richard's property which could be provided to the media after the search if SYP were asked for a comment. Drafting such a statement was a fairly normal step but it was definitely required in this case because we knew that the investigation had come to the attention of the media. I did not attach the statement to the email and I think I must have deleted it because when I looked for it later I could not find it. Matt emailed me back later that day to point out that there was no attachment. He also referred to another case we were liaising about, the investigation into the disappearance of Ben Needham. Our exchange of emails is exhibited to this witness statement as "Exhibit CG4"
14. On Monday 14 July 2014 I emailed Matt again with the wording of the proposed statement which I had drafted again. This exchange of emails with Matt is exhibited to my statement as "Exhibit CG5". Matt responded to thank me for the statement and also asked me to let him know if I needed a re interview. I am not sure what he meant. He could have been referring to a pre-interview. This is something we were discussing offering to Dan Johnson but it was not something he was comfortable about. He said that he was not touting for business. This is typical of Matt because he didn't like doing media work.
15. Earlier that day I had left a voicemail for Dan Johnson to let him know that one of my press officers would be contacting him about an abuse case we had discussed during our telephone conversation the previous week. I thought that this was his priority because it was going to court and involved a very young child so it was a big story. Dan had emailed me back and said that he was around in Sheffield for the rest of the week and we arranged to meet on the following day at 1pm.
16. Later on the afternoon of 14 July I emailed Dan to suggest that Matt join the meeting and suggested that it might be possible to get a pre-recorded interview with Matt Fenwick before he went on holiday. I made this offer because I was keen to ensure that Dan appreciated that we were

prepared to work with him so that he would work with us and not publish the story before we had secured the evidence. If Dan knew that he was getting a pre-record, his story would have a fuller picture and he would want to wait for this. The offer of pre-record was intended to slow down the story. I exchanged more emails with Dan Johnson on 14<sup>th</sup> July 2014 as he wanted to tell his bosses about the story in order to get a cameraman for the pre-record. He wanted to agree how much information he could pass on but we did not speak to discuss this. Dan wanted to be the first to report the story and he was nervous that other journalists may be aware and beat him to it. I wanted to reassure him that there was no other media attention for him to worry about but also make clear that he should not say more than the bare minimum to his boss.

17. I spoke with Matt Fenwick that afternoon and discussed the possibility of a pre-recorded interview with him. He did not want to do this and it did seem that it was too risky to go ahead with this when the search was not imminent. Instead we agreed that Matt would attend the meeting to brief Dan Johnson about the search. I emailed Dan that night to explain that it would not be possible to do a pre-record and that the purpose of the meeting on 15 July 2014 would be for Matt to brief Dan about the search.
18. On 15 July 2014 Matt Fenwick and I met with Dan Johnson in my office at SYP headquarters. Dan Johnson spoke calmly and confidently about the detail of the allegations, that it had occurred at Bramall Lane and that it involved a sexual assault on an underage boy at a Billy Graham event. He made clear that he had obtained this information from Operation Yewtree. He also spoke about the Elm Guest House allegations which were not something that I was aware of at all. I do not remember Matt speaking a great deal during the meeting and I certainly do not remember Matt saying that Dan probably knew as much as he did. Dan asked for a comment on the story, I declined.
19. Matt did explain to Dan Johnson that the investigation had passed from Operation Yewtree to SYP because it was a single allegation which had taken place in South Yorkshire. During the meeting we were attempting to play the investigation down and I do not think that anything we said could be construed as giving the impression that we were hoping that other

complainants would come forward once the story broke. This was never part of our thought process.

20. I discussed with Dan the possibility of pre-recorded interview at a later date. I do recall that he seemed jumpy when we spoke about the possibility that other media might become aware and that we would treat them the same as the BBC if they approached us. At one point one of my staff, Darryl, walked past with a video camera and this seemed to make Dan nervy.
21. Dan asked about what would be next and whether there would be a search. At the time there was a plan in place to conduct the search around 7 August and we explained this to Dan. Matt gave Dan some very general information that a party of SYP officers would travel to Sir Cliff Richard's address in Surrey. Dan asked if he could come on the search warrant. This was not an option I told him. We made it very clear to Dan that our focus was to ensure that any evidence could be secured and that running the story prior to the search could prevent that so we told Dan that we would tell him the date of the search, and he would delay publishing until the story the property was secured.
22. I explained that one of the media officers, Joanne Wright, would be handling the media aspect of the search. When I went into the meeting I had no knowledge of Sir Cliff Richard's house. It is not information that I would need as a media officer. During the meeting I recall that Dan and I searched for Sir Cliff Richard's house using Google. We looked at it together.
23. I would say that the meeting was polite and professional but Dan Johnson was making it clear to us that he had a story that he was ready to publish.
24. On 18 July 2014 I received an email from Dan Johnson asking whether he could speak to the victim and seeking clarification regarding other issues about the involvement of Operation Yewtree and another police operation codenamed Fernbridge. I never had any intention that Dan should speak to the victim. I spoke to Matt about these queries and he was clear that Dan should not speak to the victim. He also informed me that the investigation team had established that the Surrey address which

had been provided by Operation Yewtree was not current and the team were now trying to locate his current UK address. I wanted to make sure that Dan continued to trust that we were working with him so I responded to explain to him the problem with the address and assured him that I would continue to keep him posted.

25. After this Dan Johnson texted me on 24 July 2014 to ask if there had been any more progress and I texted him back to let him know that this was on hold and that SYP was focused on a manhunt for a murder suspect. I also confirmed that the alleged incident took place in 1985. Again I was trying to reassure Dan that we were committed to continuing to work with him.
26. I cannot remember when we became aware that the search was due to go ahead on 14 August but I had already briefed Joanne Wright, one of the senior media relations officers in my team about the investigation and the BBC's involvement. My intention was that she would deal with the media enquiries which were likely to follow once the BBC had broken the story. When we knew the search was going ahead I instructed Joanne that she should liaise with Thames Valley Police to let them know that there would be some media interest but that we would be leading on this. and also notify Dan Johnson of the search the day before it was due to take place. A more junior press officer, Lesley Card, was instructed to travel with the search team in order to deal with any media enquiries on the ground. Joanne prepared a statement which could be released to the media and Matt Fenwick had agreed to read it out to the media outside SYP headquarters after the search had started and the property was secure.
27. The day before the search I spoke to Dan Johnson in the early evening after Joanne Wright had told him about the search. He informed me that the BBC was planning to use a helicopter to take footage of the property I reiterated to him that he had to wait until the property was secure. I texted Lesley Card to let her know this and also to give her instructions to let Dan Johnson know what time the warrant was going to start. My expectation was that Dan would not turn up until after we had secured the property.

28. On the day of the search, I was working at force headquarters at Carbrook House. In the early morning Lesley texted me to let me know how the search was going and she told me that the house was a long way from road but that the BBC had taken pictures of the search team going into the property. I was pleased about this because I didn't want the BBC to get pictures of the search taking place. I was not so sure that Dan Johnson would be pleased about this though.
29. Later on in the morning Lesley texted me again because Dan Johnson was pressing her for information about the property. I explained to her that it was for Dan to make his own enquiries about this. By this stage I felt we had done what we agreed to do and it was not for SYP to do anything more.
30. I recall watching the story break on the news with the rest of the media team. I saw Dan Johnson on the BBC news breaking the story. A barrage of calls then started coming in. I was not personally involved in fielding those calls but I was aware that ITN had called and were upset that they had not been given the story.
31. After the story had broken on the BBC news and other media were picking up the story it became important to ensure that SYP provided a consistent media line to all media outlets. Starting from 1pm on 14 August 2014 the media relations team put out a number of press statements on the SYP website. Statements were put on the website at 1pm, 4.08pm, 4.28pm and 6.37pm on 15 August 2014. They were intended to be bland statements that the media could use. It would assist the media team in dealing with queries because they could refer journalist to the statements. If the media were to pick up and use one of these statements it would be quoted as being from an SYP spokesperson.
32. In the early evening I saw an item by Danny Shaw on the BBC news website which suggested that SYP had given information about the investigation to the BBC in order to maximise publicity. I was dismayed about this because it could not be further from the truth. I made Matt Fenwick and the Chief aware and contacted Dan Johnson to speak with him about this. Dan agreed with me that the piece was misleading and I

recall that he said that he found it 'disgusting'. He said he would try to get it taken down.

33. Matt Fenwick was furious about the item and was saying that the BBC had blackmailed SYP. I know that he called Dan Johnson shortly after I did to try and get him to take the item down.
34. After Matt and I had called Dan Johnson I received a telephone call from Matthew Shaw at the BBC. He explained that the BBC was standing by Danny Shaw's item. I maintained that the item was misleading and should be taken down. Matthew Shaw explained that his senior manager, Gary Smith, would speak to Dan Johnson and Danny Shaw and come back to me in the next day. I explained that if the situation was not corrected then SYP would have to put out its own statement.
35. On the morning of 15 August 2014 Gary Smith called to say that the BBC would not remove Danny Shaw's item. I then sent the BBC a draft statement and offered them a right of reply. Shortly after this I received a telephone call from Jonathan Munro. He was offering to clarify that SYP was not the original source of the information about the investigation. He later emailed me to confirm the offer. This eventually resulted in Mr Munro issuing a tweet which confirmed the position but the Danny Shaw article was not retracted so I emailed Jonathan Munro again to put a statement to him which reflected SYP's position that it had worked with the BBC in order to protect the integrity of the investigation. Copies of the emails I exchanged with Jonathan Munro are exhibited to this witness statement marked as "Exhibit CG6"
36. The barrage of media attention continued to build over Friday and the weekend and the Sunday Times in particular was alleging that SYP had sought media attention. The Chief was becoming increasingly irritated about this and so on the weekend we worked on another statement which was put out to the media and a separate statement which went to the Sunday Times. The Chief also decided to make a formal complaint to the BBC which I drafted and was sent on 17 August 2014. On the afternoon of 17 August 2014 I received a text message from James Hardy at the BBC. He asked if I could give him the name of someone in the Director-General's office who could speak to the Director-General. I confirmed that

the Chief would be happy to speak to the Director-General but James responded to say that it was one of the Director-General's right hand men who wanted to speak. I agreed with James that the Chief would call Phil Harrold on Monday when he was back in the office. Copies of the texts I exchanged with James Hardy on 17 August are exhibited to this witness statement as **"Exhibit CG7"**

37. On the Monday 18 August 2014 the Chief broke off from his holiday and there was a gold group meeting in the morning when we discussed the contact with the BBC prior to going to a meeting with the PCC in order to brief him and discuss what action should be taken. The Chief and I also had a call with a senior manager at the BBC, Phil Harrold. I sat in on the call and didn't participate but this seemed to diffuse the situation.

38. After the search I did not have any further contact with Dan for some time. I received a text message from him on 12 December 2014 which read,

*"Thanks for your message Carrie, appreciate your approach. Sure it won't be long before I'm in touch."*

Prior to receiving this text message I had received a call from Dan which I decided not to answer so he had left me a voicemail. I recall that Dan's message said something like he hoped there were no hard feelings and that we could continue to work together in the future. I responded by calling him and leaving a message in which I said that my team would continue to deal with him in the future.

39. I received a further text message from him on Sunday 17 April 2015 after he had seen me on Ecclesall Road in Sheffield. I responded out of courtesy and he replied again. The texts I exchanged with Dan Johnson in December 2014 and April 2015 are exhibited to my statement as, **"Exhibit CG8"**

#### **STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement are true.

Signed:



Dated:

30.11.17

Name:

C Goodwin

**Claim No: HC-2016-002849**

**IN THE HIGH COURT OF JUSTICE**

**B E T W E E N:**

**SIR CLIFF RICHARD, OBE**

**Claimant**

**AND**

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**Defendants**

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**WITNESS STATEMENT OF CARRIE  
GOODWIN**

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**DWF LLP  
Scott Place  
2 Hardman Street  
Manchester  
M3 3AA**

**DX: DX: 14313 Manchester**

**Tel: 01618380463**

**Ref: AYH(RJN)/2018268-1**

**Solicitors for the Second Defendant**