



Response to Request for Information

Reference FOI 000247
Date 29 June 2016

West Midlands Pension Fund

Request:

I would like to request a spreadsheet listing the current investments held by the West Midlands Pension Fund. I would require that this list of assets is dated at no later than 30/4/2016, contains unique identifying IDs for each holding rather than just descriptive names, has a current valuation figure in £s and has the number of units held where appropriate.

This information is requested under the Freedom of Information Act 2000 ("FOIA").

Details on this Freedom of Information request:

The total investments currently held by West Midlands Pension Fund ('The Pension Fund') in:

- a. Funds, Unit trusts, oeics or any open ended investment vehicle which is pooled
- b. Private Equity Investments
- c. Property Investments
- d. Hedge fund investments or fund of hedge fund investments
- e. Infrastructure investments
- f. Direct holdings in shares and bonds

For the avoidance of doubt, the request covers any mandates the Pension Fund has given to third parties and the underlying holdings within those mandates, as well as any investment-related insurance policies.

Wherever appropriate this information should include unique identifying codes, such as fund SEDOL / ISIN / share Tickers, and not just a descriptive names for each holding.

In the case of item a. above it should state the number of units held and the current valuation of each and every investment as such investments are priced on a daily, weekly or monthly basis. Mandates or segregated accounts run by external managers should also state the company name, asset class and geographical region covered.

The information should be provided in the most up to date form held by you as at the date of this request, preferably as of the end of the previous month. Please clearly confirm the date of your valuations and holdings.

All of the above comprises the "requested information".

Delivery Format

We would like the requested information to be made available electronically in an

unlocked condition and in a form which is re-usable (i.e. readable and capable of being manipulated and edited), preferably in Microsoft Excel format or, if that is not practical, in an open source format such as a CSV file.

We anticipate that the requested information is likely to be held as a data set or part of a data set (within the meaning of s.11A of FOIA) and therefore should be made available for re-use. The Secretary of State's Code of Practice recommends use of the Open Government Licence version 3 ("OGL") for the supply of information contained in data sets for use and re-use without charge, restriction or limitation. We are happy to agree to the terms of the OGL which we believe is the basis on which the information above will be supplied.

Nature of the Request

We believe that this information will not be expensive or cumbersome to provide as The Pension Fund or its advisers will have continuously up-to-date lists of its investments and their value as an essential monitoring tool.

Some public bodies already provide this information either on their websites or in response to Freedom of Information notices. We do not believe that you have published this information recently, but if you have done so, please direct us to where it is available online. Section 21 denials for this request will only be recognised if the complete contents of our FOI request are accessible in their entirety (investment name / investment unique ID / no. of units / investment valuation), is recent in date and is in a suitable format for download.

We do not anticipate that any of the exemptions in Part II of FOIA will arise in respect of the requested information. In particular, we do not believe that the information is confidential or that its disclosure could prejudice any commercial interest (indeed, this seems to be borne out by the fact that other authorities have made information of a very similar nature public). In any event, we consider that the public interest in the public, including the beneficiaries of the Pension Fund including your employees, knowing how the Pension Fund is investing is likely to outweigh the maintenance of any confidentiality or commercial interest.

[In response to your request please find attached information as requested.](#)