

From: [Foi Enquiries](#)
To: [REDACTED]
Subject: FOI-17-0823 - Pension Fund
Date: 26 June 2017 10:19:20
Attachments: [Further Information - Right to Review & Appeal.pdf](#)

Dear [REDACTED]

Thank you for your information request of 12 June 2017. Aberdeen City Council (ACC) has completed the necessary search for the information requested.

You submitted an identical request during October last year (FOI-17-1388) and our response to your latest request has not altered during that time-period.

Under the Freedom of Information Act (FOIA), I request a copy of the quarterly public records from the latest quarter for the following information about The North East Scotland Pension Fund, if possible in Excel format:

1. Names and vintages of all private equity and infrastructure partnerships or funds in the pension scheme's portfolio.

This information is given on our webpage, http://www.nespf.org.uk/Investment/inv_managers.aspx. As this information is otherwise accessible it is exempt from disclosure. In order to comply with its obligations under the terms of Section 16 of the FOISA, ACC hereby gives notice that we are refusing your request under the terms of Section 25(1) - Information Otherwise Accessible - of the FOISA.

2. Percentage of the pension fund currently invested in private equity and infrastructure, and the target percentage allocation for the past three years.

The percentage of the Fund that we currently invest in Private Equity is 5% as at 30 Apr 2017.

We did not have a separate target percentage allocation for Private Equity in 2015 & 2016 this asset class was incorporated in our Alternatives asset allocation which was 10% - to year end Mar 2016, 10 % - to year end Mar 2015. Our percentage allocation to Private Equity to year end Mar 17 was 5%.

Our investment Strategy can be found in our Statement of Investment Principles on the below webpage.

http://www.nespf.org.uk/Investment/inv_principles.aspx

As this information is otherwise accessible it is exempt from disclosure. In order to comply with its obligations under the terms of Section 16 of the FOISA, ACC hereby gives notice that we are refusing your request under the terms of Section 25(1) - Information Otherwise Accessible - of the FOISA.

3. Current information on amount committed to each partnership and amount drawn by

the partnerships.

This information is given on our webpage, http://www.nespf.org.uk/Investment/inv_managers.aspx. As this information is otherwise accessible it is exempt from disclosure. In order to comply with its obligations under the terms of Section 16 of the FOISA, ACC hereby gives notice that we are refusing your request under the terms of Section 25(1) - Information Otherwise Accessible - of the FOISA.

4. Internal rates of returns (IRRs) for each individual partnership for the most recent date available. Please include date for net and gross IRRs, if available. Please also include other performance metrics used by your pension fund.

The Fund does not hold IRRs. For performance see answer to question 7.

5. Please name any private equity and infrastructure co-investments you have made, and the manager responsible.

6. The only co-investments that the Fund invests in are incorporated through our Fund of Fund Private Equity investments, which we do not disclose under the commercial interests exemption. ACC is unable to provide you with the name any private equity and infrastructure co-investments made as this information is considered exempt from disclosure. In order to comply with its obligations under the terms of Section 16 of the FOISA, ACC hereby gives notice that we are refusing your request under the terms of Section 33(1)(b) – Commercial Interests and the Economy – of the FOISA.

In making this decision ACC considered the following points:

Do commercial interests exist in relation to the information?

The release of this information would prevent the fund from accessing top quartile fund managers, which would have a negative impact on the funding position of the pension fund. This would ultimately have an impact on the tax payer. ACC considers that commercial interests exist in relation to this information because it comprises information about the costs and fees paid for the management of the North East Scotland Pension Fund.

Whose commercial interests exist in relation to the information?

North East Scotland Pension Fund.

What is the nature of those interests?

Aberdeen City Council has to effectively manage the investments of the North East Scotland Pension Fund in relation to the pension fund. To do this, ACC hires Fund Managers to manage the investments associated with the North East Scotland Pension Fund.

What level of harm would result from disclosure of this information?

Disclosure of this information would detrimentally affect ACC's ability to access the top quartile of Private Equity Fund Managers. ACC consider it very likely that, if this information is released, that it will impact on its ability to access the Fund Managers it wanted at the fees it was prepared to pay. ACC is currently able to negotiate the rate that it pays to Fund

Managers. ACC consider that, were we to release the rates we are able to negotiate with these Fund Managers, we would prejudice our commercial relationship with these Fund Managers who would not agree to negotiated rates with ACC if they considered that these rates would be made public. Upon discussion with our current Fund Managers, they have advised us that this would be the case.

Where does the public interest lie in relation to the information?

The exemption claimed by ACC is a non-absolute exemption. Where a non-absolute exemption applies, ACC is required by Section 16(2) of FOISA, to inform you as to why in all the circumstances of the case, the public interest in maintaining this exemption outweighs the public interest in disclosing this information to you.

While ACC identifies that there is a public interest in the financial information of ACC, in terms of 'following the public pound', ACC feels that the release of the information would prevent the fund from negotiating reduced fees, which would have a negative impact on the funding position of the pension fund. This would ultimately have an impact on the public purse. Therefore, it is in the public interest for this information to be exempted from release.

7. Please disclose any direct private equity and infrastructure investments you have made.

None

8. Investment multiple for each partnership.

Money multiples can be worked out using the information on webpage http://www.nespf.org.uk/Investment/inv_managers.asp. As this information is otherwise accessible it is exempt from disclosure. In order to comply with its obligations under the terms of Section 16 of the FOISA, ACC hereby gives notice that we are refusing your request under the terms of Section 25(1) - Information Otherwise Accessible - of the FOISA.

9. Names of all private equity and infrastructure partnerships or funds partially or fully sold by the pension scheme, including date of sale.

None for the Last Quarter.

10. Names of advisors mandated by the pension fund to advise on allocations to private equity and infrastructure.

None.

11. Names and contact details of the individual responsible for the pension funds allocation to private equity and infrastructure.

Pension Fund Manager, Laura Colliss lcolliss@nespf.org.uk.

We hope this helps with your request.

Yours sincerely,

Information Compliance Team

INFORMATION ABOUT THE HANDLING OF YOUR REQUEST

ACC handled your request for information in accordance with the provisions of the Freedom of Information (Scotland) Act 2002. Please refer to the attached PDF for more information about your rights under FOISA.

Information Compliance Team
Communications and Promotion
Office of Chief Executive
Aberdeen City Council
3rd Floor North
Business Hub 17
Marischal College
Broad Street
ABERDEEN AB10 1AQ

foienquiries@aberdeencity.gov.uk

Tel 03000 200 292

*03000 numbers are free to call if you have 'free minutes' included in your mobile call plan.
Calls from BT landlines will be charged at the local call rate of 10.24p per minute (the same as 01224s).

www.aberdeencity.gov.uk