

London Borough of Barnet  
2 Bristol Avenue,  
Colindale NW9 4EW  
15 September 2022  
Our ref: 8368470

Thank you for your request received on 17 August 2022, for the following information:

**I am currently seeking updated quarterly performance data from your plan's alternative asset holdings for the following date(s): 2Q 2022**

**As always, thank you in advance for the time you take in sending me the responsive documents. Please feel free to let me know if there is anything I can do on my side to make this process easier for you.**

**On behalf of PitchBook Data, Inc., under the Freedom of Information Act, I request a copy of the quarterly public records from 2Q 2022 the following information, preferably in Excel or PDF format.**

- 1. Names and vintage years of all private equity, venture capital, mezzanine, distressed, real estate/REIT, debt and infrastructure partnerships in your plan's portfolio.**
- 2. Commitments made to each partnership.**
- 3. Contributions drawn down since inception.**
- 4. Distributions made to your entity to date by each individual partnership.**
- 5. Net Asset Value of each partnership.**
- 6. Internal rates of return (IRRs) for each partnership with and without the use of credit facility. Please note if the IRRs are not net.**
- 7. Investment multiple (TV/PI) for each individual partnership.**
- 8. The dollar amount of 'total management fees and costs paid' for each individual partnership.**
- 9. Date as of which all the above data was calculated.**
- 10. Names of all alternative asset partnerships partially and fully sold by your plan including date of sale.**
- 11. For each fund, please indicate whether or not the fund uses Subscription Credit Facilities.**

**I also request a copy of any disclosable documents which contain some or all of the following information:**

- 12. Names of all hedge fund holdings (including hedge fund of funds) in your plan's portfolio.**
- 13. Month by Month Market Value for each hedge fund holding (including hedge fund of funds) since your plan's initial investment up to 2Q 2022.**
- 14. Month by Month Contributions to each hedge fund holding (including hedge fund of funds) since your plan's initial investment up to 2Q 2022.**
- 15. Month by Month Returns (net of fees) earned by your plan's for each hedge fund holding (including hedge fund of funds) since initial investment up to 2Q**

**2022.**

**If there are any fees for searching for, reviewing, or copying the records, please inform me before you task the request. If you deny all or any part of this request, please cite each specific exemption you think justifies your refusal to release the information and notify me of appeal procedures available under the law.**

**Please do not hesitate to contact me with any questions.**

We have processed this request under the Freedom of Information Act 2000.

## **Response**

I can confirm that the council holds the information you requested. However we are withholding the information because we consider that the following exemption exemptions and exceptions apply to it.

Please see the answers for questions 1 - 3, 5 and 9 - 12, which are in the document labelled 'Q3 2021/2022 London Borough of Barnet Investment Monitoring Report'

[Barnet Pension Fund - Alternative and Private Funds - Barnet Open Data](#)

Question 4, 6 - 8, please see the refusal notice on the below open barnet link which is in the document labelled 'Alternative and Private Funds Exemptions'

[Barnet Pension Fund - Alternative and Private Funds - Barnet Open Data](#)

Questions 13 - 15 please see the exception below

### **S12 - Cost limit (Exceeds Appropriate Limit)**

We are refusing your request under section 12 because we estimate that compliance with your request will exceed the "appropriate limit" under section 12. The appropriate limit is £450 which is equivalent to 18 hours at £25 per hour. The per hour figure is set by Regulation rather than actual salary paid to any officers handling requests. The appropriate limit includes the time it will take the council to discover if it holds the information requested, to locate it, extract it and collate it as well as putting it into any particular format requested by the requester.

We have calculated that it will take approx 360 Hours to comply with your request. Our calculation is as follows:

It took 10 minutes to find and verify each month (if we have them), then an average of 60 months per fund= 6 hours per fund, totalling 120 hours in total (3 weeks). This would be done 3 times and would take about 360 hours.

### **Advice and Assistance**

Unfortunatley, we are unable to narrow this request down further.

### **Further information**

If you are interested in the data that the council holds you may wish to visit Open Barnet, the council's data portal. This brings together all our published datasets and other information of interest on one searchable database for anyone, anywhere to access. <http://open.barnet.gov.uk/>

### **Advice and Assistance : Direct Marketing**

If you are a company that intends to use the names and contact details of council officers (or other officers) provided in this response for direct marketing, you need to be registered with the Information Commissioner to process personal data for this purpose. You must also check that the individual (whom you wish to contact for direct marketing purposes) is not registered with one of the Preference Services to prevent Direct Marketing. If they are you must adhere to this preference.

You must also ensure you comply with the Privacy Electronic and Communications Regulations (PECR). For more information follow this Link [www.ico.org.uk](http://www.ico.org.uk)

**For the avoidance of doubt the provision of council (and other) officer names and contact details under FOI does not give consent to receive direct marketing via any media and expressly does not constitute a 'soft opt-in' under PECR.**

### **Your rights**

If you are unhappy with the way your request for information has been handled, you can request a review within the next 40 working days by writing to the Information Management Team at: [foi@barnet.gov.uk](mailto:foi@barnet.gov.uk). Or by post to Records & Information Management Service, Assurance Group, London Borough of Barnet, 2 Bristol Avenue, Colindale, NW9 4EW

If, having exhausted our review procedure, you remain dissatisfied with the handling of your request or complaint, you will have a right to appeal to the Information Commissioner at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (telephone: 0303 123 1113; website [www.ico.org.uk](http://www.ico.org.uk)). There is no charge for making an appeal.