

Information Access Team



Edward Jones

**Hertfordshire County Council**  
County Hall,  
Room 216 Pegs Lane,  
Hertford, SG13 8DE,  
Postal Point: CHO320  
[www.hertfordshire.gov.uk](http://www.hertfordshire.gov.uk)

Tel: 0300 123 4040

Email: [information.governance@hertfordshire.gov.uk](mailto:information.governance@hertfordshire.gov.uk)

Our reference: 1626239

Your reference: request-961705-9f5408bc@whatdotheyknow.com

Date: 10 May 2023

Dear Edward Jones

**Freedom of Information Act 2000**  
**Reference number: 1626239**

On 30<sup>th</sup> April 2023 you requested a revised spreadsheet, you asked : -

*Many thanks for your response and help with this. Also many thanks for trying to provide all the data and using the Google template we provided - much appreciated.*

*I am hoping that this can be dealt with as a clarification, and not a internal review, to ensure a quicker response. Please let me know if an internal review is necessary.*

*There is one issue which I am hoping you could help me with.*

*In the data you sent there are no ISIN or LEI and you have provided the explanation: "The pensions investment team do not hold ISIN numbers on record."*

*Can you provide any other investment identifier such as SEDOL or CUSIP ? If necessary, can you go back to the investment managers for the ISINs/LEIs or other? As stated in the original request: "For any investments that do not have an ISIN number, such as some alternative assets, please provide the Legal Entity Identifier (LEI). If an investment does not have an identifier, please provide an explanation."*

*We really need either the ISIN or LEI identifiers for all investments to help us accurately analyse the data and ensure there are no mistakes. Please note that other pension funds have provided both ISINs and LEIs for all investments (e.g. Gwynedd Pension Fund <https://www.whatdotheyknow.com/request/g...>). I can provide many more examples of other pension funds providing both LEIs and ISINs on request. The template spreadsheet we provided in the original FOI request also shows exactly what information we want: <https://docs.google.com/spreadsheets/d/1...>*

**County of opportunity**

*If necessary, if the information is not held by the investment managers, can you request that they (or can you) use this LEI lookup tool to find the identifier information for the remaining investments: <https://www.lei-lookup.com/record/> The problem with us using such a tool is that it is easy to make mistakes as many investments have several variations/similar names. So ideally someone who is familiar with the pension funds investments would do this to prevent mistakes and ensure we have the correct identifier for each investment. This would really help us accurately analyse the data provided, and fairly portray to what extent the pension fund invests in fossil fuels*

### **Our Response**

Your request for information has been considered under the Freedom of Information Act 2000 I can confirm that Hertfordshire County Council does hold the information you have requested, and can respond as follows: -

[Please see revised spreadsheet](#)

If you have any questions, please do not hesitate to contact me, quoting the reference above. To find out more about Freedom of Information, please visit <http://www.hertfordshire.gov.uk/your-council/work/foi/>

If you are unhappy with the way the County Council has handled your request for information you may request an internal review of the request. This will be carried out by a member of the County Council Legal Services Team, who has had no prior involvement with the request. Requests for an internal review should be sent to the Information Governance Unit at the address above.

If you are unhappy with the outcome of the internal review you are entitled to ask the Information Commissioner to investigate your complaint. You should write to: FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely

Ingrid Howard  
**Information Access Practitioner**  
**Hertfordshire County Council**