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**RE: FOI Request**

1 message

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**Keble FOI** <foi@keble.ox.ac.uk>

Mon, Aug 19, 2024 at 1:12 PM

To: 

Dear ,

This is in reply to your enquiry received by the College on 25 July 2024 and made under the Freedom of Information Act 2000 (FOIA). I can confirm that the College does not hold complete information related to your request.

For context, 95% of Keble College's investments are managed by Oxford University Endowment Management Limited ("OUem"), through which it own units in the Oxford Endowment Fund which in turn invests in investment groups globally, rather than individual companies. The Oxford Endowment Fund does not invest in individual companies and no information is shared with the College on the companies held in these vehicles. We do not hold this information and are unable to share it; however, we note that even if these vehicles had shared the information with us, it may have been exempt under sections 41 (confidentiality) and 43 (commercial interests).

During the period your request relates to the College held an investment in another investment vehicle which invested in other private equity funds, rather than individual companies, and no information is shared with the College on the companies held within these vehicles. We do not hold this information and are unable to share it; however, we note that even if these vehicles had shared the information with us, it may have been exempt under sections 41 (confidentiality) and 43 (commercial interests).

The College has 3 direct investments (4%) of which none are any of the companies listed below or stated on the OHCHR's database. These companies may have further investments but are not required to share all this information with the College. From the information provided to the College it is not aware of any investments in the listed companies.

The College also has investments held through two Private Equity fund vehicles (1%). None of the companies listed were invested in by these funds.

If you have further questions please ask me in the first instance. Details about the College's approach to Freedom of Information, including who to ask for a review, can be found at <https://www.keble.ox.ac.uk/freedom-of-information/>. If, after following those procedures you are still not satisfied with the way in which your request has been dealt with you may apply directly to the Information Commissioner for a decision.

Yours sincerely,



[REDACTED]  
[REDACTED]  
Keble College • Oxford OX1 3PG

[REDACTED] • Charity No. 1143997



*For information about how we process data please see our Privacy Notices.*

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**From:** Keble FOI  
**Sent:** 26 July 2024 09:05  
**To:** [REDACTED]  
**Subject:** RE: FOI Request

Dear [REDACTED]

Thank you for your enquiry received by the College on 25 July 2024 and made under the Freedom of Information Act 2000 (FOIA). We will respond within 20 working days, as defined by Section 10 of the FOIA.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Keble College • Oxford OX1 3PG

[REDACTED] • Charity No. 1143997



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**From:** [REDACTED]  
**Sent:** 25 July 2024 22:36  
**Subject:** FOI Request

To whom it may concern,

I'm writing to request information regarding your College's investments under the Freedom of Information Act 2000.

Could you please provide the following information:

1. The direct and indirect investments that your College has held in Israeli-domiciled companies, as well as any companies domiciled in the Occupied Palestinian Territories, or Occupied Syrian Golan. Please provide this information for the financial years 2019/20, 2020/21, 2021/22, 2022/23, and any information available for 2023/24.

2. The direct and indirect investments that your College has held in companies complicit in Israeli occupation. Please provide this information for the financial years 2019/20, 2020/21, 2021/22, 2022/23, and any information available for 2023/24. As I assume that this may not a category that is accounted for in general investment reporting, please see the list below of companies that I would like this information for:

Caterpillar Inc.

J.C. Bamford Excavators Limited (JCB)

Any companies on the OHCHR's database of business enterprises involved in illegal Israeli settlements, linked here: <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session31/database-hrc3136/23-06-30-Update-israeli-settlement-opt-database-hrc3136.pdf>

Hewlett-Packard Company

Siemens

In the event that retrieving this information would exceed the limit as set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, then please answer question 2 first, taking the above list of companies as in priority order. If responding to the OHCHR list is still likely to reach the limit set out, then please give the data about the College's investments in Israeli-domiciled companies in the database.

If you are still to invoke Section 12 to withhold information in relation to any of these questions please provide details of how locating, retrieving and extracting this information would exceed the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. Please also be aware of your duty under section 16 (1) of the Act to advise and assist me in narrowing my request to bring it within the appropriate limit.

If you are to invoke Section 43 to withhold information in relation to any of these questions please provide details of the exact FOIA exemption, details of who would be prejudiced by this information, and a public interest test justifying a conclusion with arguments for and against the release of the information.

I am happy to provide any clarifications required to support this request, please be in touch at any time. Thanks very much for your help with this request and I look forward to your response within the next 20 working days.

Yours faithfully,

