

3 November 2004

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**RE: NORTHERN IRELAND MULTIPLE DEPRIVATION MEASURE 2004:  
RESPONSE TO CONSULTATION DOCUMENT**

Dear Madam,

Ballymoney Borough Council welcomes the opportunity to respond to the consultation document on the Review of Measures of Deprivation. Council has reviewed the document and would like to make the following comments.

#### **General Comments**

It would be important to emphasise from the outset, that multiple deprivation indicators should be used with caution and that sole reliance on such indicators for the purposes of fiscal decision making should be discouraged. The usage of such indicators must be complemented by the use of timely qualitative evidence e.g. local knowledge of need.

Notwithstanding the above qualifier, the following comments should be noted. Most comments relate to the absence of indicators within the domains as well as the lack of timeliness of some of the datasets. In almost all cases, the Research Team have already commented on their absence, which is mainly due to lack of measurable data or recorded datasets, so these will not be duplicated.

One point to be aware of is that when datasets are 3 years out of date, account must be made for recent developments that may not be recorded in these figures, whether they be positive or negative influences - e.g. the implementation (or withdrawal) of a project within a specific Census Output Area (OA), may impact positively (or negatively) on a particular measure of deprivation, thereby rendering it inaccurate.

#### **Domains**

Weak Community infrastructure should be included within the domain entitled Geographical Access to Services, since where there is community infrastructure in place this gives the population opportunities for access to services.

It would also be important that the inclusion of such a domain allows for the car ownership *per household*, rather than *per adult 17 or over*. To suggest that a 17 year old without access to a car is in some way deprived, while his parents may both have cars, is a very simplistic view. Measuring car ownership from DVLNI statistics may not capture the true level of car ownership, when consideration is given to the fact that an element of

unregistered car ownership exists. While these cars may not be registered, their owners are certainly not deprived of access to a car.

The addition of a crime domain is to be welcomed however, it is unfortunate that the fear of crime remains immeasurable, particularly as this is an important issue in Ballymoney Borough.

## **Indicators**

In relation to Indicators within each of the domains the following amendments are suggested.

### **Income Deprivation**

*It is noted that people of pension age and above are currently wholly excluded from this domain. Therefore, as suggested (page 6)*

- Include an Income Deprivation Affecting Older People Measure.

*However, rather than including just Income Support claimants (as not all who are entitled claim income support), include*

- Persons in receipt of state pensions only (i.e. those who are not receiving any other income and therefore do not have to complete tax returns).

*Additionally, according to research conducted by the NIHE research unit, within the league of fuel poverty by Council area, Ballymoney ranks 3<sup>rd</sup> most deprived, with 45.4% of total households being fuel poor (definition of fuel poverty is: 'if a householder needs to spend more than 10% of income to maintain required levels of energy use'). It is noted that these cannot be combined, as there may be some overlap.*

- Number/percentage of households defined as fuel poor.
- Households in receipt of housing benefit.

### **Employment Deprivation**

*It is noted that 16 –18 year olds are not included in this category even though there are some unemployed within this age group.*

- Claimant counts should therefore start from age 16.

### **Health Deprivation & Disability**

*Question mark over measures of emergency admissions to hospital, as large range of reasons for emergency admission, from dehydration as a result of gastroenteritis to cardiac arrest, to injuries as a result of a road traffic or other accident. Also as there is some correlation between the rate of pulmonary and cardiac disorders and deprivation, believe this should be included, as follows:*

- Individuals suffering from pulmonary and cardiac disorders based on prescribing, hospital in patient systems, etc, excluding those receiving the following benefits (Disability Living Allowance, Attendance Allowance, Incapacity Benefit and Severe Disablement Allowance).

### **Education & Training**

Agreement on the proposal to create 2 sub-domains, one for working age adults and one for children/young people.

However, in relation to the latter, there is a question mark over why the indicator relating to proportion of Years 11 and 12 pupils not in a grammar school was included as a measure of deprivation. Grammar Schools are limited in their intake and criteria for intake is often subject to the school's policy. Where there is a large demand for a school, the criteria for allocating places can include: siblings/relatives in attendance to the school, distance from the school, etc. Furthermore, the choice of school for secondary level education is a personal choice for parents and prospective pupils and decisions may depend on facilities being offered, distance from home, etc. Not everyone who scores highly in their '11+' selects a grammar school education. Consequently, it is believed the following domain should be excluded:

- Proportions of Years 11 and 12 pupils not in a grammar school.

### **Geographical Access to Services**

It is believed that in relation to transport there will be a number of difficulties. Using the frequency of service will be useful, but it will have to be based on actual service provided rather than scheduled services, as scheduled services are not always maintained. Also bus stops in some areas are no longer actually serviced by public transport, so care will have to be taken that this indicator excludes bus stops not serviced by a regular bus route.

Care will also have to be taken in relation to the definition of walking distance, which is not elaborated upon, the average of which for an aging population or a population with a high percentage of young children could be substantially different for a population within the mid-age range. Maybe weighting for walking distance should be included to allow for the age profile of a particular area.

### **Crime**

Information collated relates to the location of crimes committed rather than offender data. This distorts the notion of deprivation relating to deficiency and lacking, as often victims of crimes such as burglary and theft are those that are perceived as 'having' being targeted by those who 'have not'. It would be helpful if information was available on the location of the perpetrators of crime. Offenders could be categorised according to the highest level/main type of crime committed by them, which would avoid duplicate counts where one individual has committed a number of crimes. In addition, there is also room for 2 sub-domains, i.e. young offenders/juvenile crime, and adult criminals.

### **Living Environment**

Under the domain Living Environment, an important measurable indicator could be the degree of vacant commercial property as a measure of a town's vitality. On a related issue, how the MDM distinguishes between OAs which cover commercial or retail centres rather than residential areas should be clarified.

## **Weighting**

There is concern that that income deprivation and employment deprivation are already so highly correlated, that to give them a weighting of 25% each and a combined value of 50%, may be considered too high.

In relation to weighting Weights B could be deemed fairer, although it can be debated that the weighting of the Education, Skills and Training domain should be more comparable to that of the Income and Employment domains. This is because it could be argued that there is the same level of linkage/correlation between this deprivation

indicator as there is between Income and Employment, which are equally weighted higher.

Concerns over the use of the information produced especially if the information produced is not at small area level. Government and other bodies issuing funding currently use statistics such as these for the allocation of resources. What happens to an area, such as a borough council area, that is not deemed deprived using the Multiple Deprivation Measure but has small areas of high-level deprivation or suffers from a specific form of deprivation, e.g. access to services?

If you have any queries, please do not hesitate to contact me.

Yours sincerely,

Lisa O'Kane  
Economic Development Officer