

**Bogside and Brandywell Initiative
Response to the Consultation Document on
Multiple Deprivation Measures**

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Introduction

Bogside and Brandywell Initiative (BBI) welcomed the original attempts to establish a set of robust indicators which were capable of being updated on a regular basis. This attempt to further refine and update the indicators is a logical follow on from the work of Mike Noble and his team and is to be welcomed.

BBI recognises the importance of having such robust and updatable indicators given the claim by government departments that their policies are primarily aimed at concentrating support and investment to those sections and areas of the North most afflicted by deprivation and poverty. As such, it is essential that the means by which such deprived areas are identified (i.e. deprivation indicators) accurately reflect their current status.

Domains and Methodology

BBI feels that the normalisation of data, ranking, application of the exponential function are acceptable but we want to clearly indicate that we view the weighting of the individual indicators within each domain measures as something that needs to be approached in a strictly objective and rigorous manner in order to reduce any risk of bias.

With the exception of Crime, the Domains identified are broadly similar to those adopted in the first Noble Index. However, attention must be paid to the measures identified within each of the Domains and sub Domains and the relative effects that changes in these from the last Noble indicator will produce in relative deprivation levels.

Contained within the consultation document is the proposal that the weighting for crime and living environment measures (the old Social Environment and Housing Stress) be increased from 10% to 20%. BBI does not accept that there is any justification for this proposal. We believe that the importance of this proposed change in terms of a potential significant bias in the output data and rankings will become much more obvious when the crime domain indicators are studied further.

Furthermore, there is a proposal to reduce the weighting of Health Deprivation and Disability and Education, Skills and Training Deprivation from a combined total of 30% to 20%. BBI feels that no justification for these proposed changes has been offered.

We are conscious that the weighting of the domain factors in the overall Multiple Deprivation Measure (MDM) is of huge significance and that the overall ranking of Super Output Areas (SOAs) could and should have a major impact on investment and governmental support decisions. Thus, given the failure to set out any justification for the proposed weighting changes BBI believes that the weightings given to the domains in 2001 should be retained.

The Consultation paper makes it clear that income deprivation and employment deprivation are key drivers of other deprivations. BBI accepts that there is a correlation between these factors and other non-quantifiable aspects of poverty and deprivation and as such we are glad to see that their weightings have been maintained.

BBI would propose the following weightings (as opposed to those suggested):

Income Deprivation	25%
Employment Deprivation	25%
Health Deprivation and Disability	15%
Education, Skills and Training Deprivation	15%
Geographical Access to Services	10%
Living Environment	10%

BBI is opposed to the inclusion of a separate Crime domain. We oppose its inclusion on two grounds, firstly the indicators suggested are not reflective of deprivation and secondly, given peoples differing views on current policing arrangements and their unwillingness to engage with the PSNI then the indicators are not capable of being robust. We believe that the 'crime/security' indicators could be contained within the Living Environment measure which would be given an increased weighting.

Our proposal would involve a number of changes from that adopted in the NI MDM 2001 measure. Firstly it would mean that there would only be six domains, with the social environment measure being included into the living environment measure. Secondly, the living environment weighting would be increased to 10% to reflect the increase. Thirdly, it would mean that in future there would only be six deprivation measures feeding into the overall MDM.

Indicators

Income Deprivation

BBI is concerned that the inclusion of the numbers of children living in houses in receipt of income support, JSA (IB), or Disability Working Allowance as opposed to the two measures of adults and children alone. We feel that by lumping adults and children together that this might prejudice the capture of the full effect of income poverty on both children and adults.

We welcome the updating of the measures to include reference to Working Family Tax Credit but feel that some thought needs to be given to incoming changes in regards to Working Tax Credit and Children's Tax credit and how the measure will be updated. We are delighted to acknowledge the adoption of this benefit on the basis of a 60% income threshold as this will ensure a sharper picture of income than the benefit generally. The inclusion of those groups not 'captured' by inclusion on these benefits but who are in households in receipt of housing benefit or rate rebate is to be welcomed.

We agree with the production of two measures focussing on Children and Older People Income Measures. These should help to produce more focussed policies in regard to these two groups.

Employment Domain

BBI is happy that the existing indicators have been updated and improved in their accuracy and pleased to see that the unemployment statistics will be more easily updated.

Whilst we understand the difficulties in measuring exclusion from the labour force in an ongoing manner, we are aware that there are significant statistical problems associated with treating the hidden workforce by using a total of those on incapacity benefit, severe

disablement allowance recipients and New Deal participants. There needs to be some measure of that large section of women who are currently excluded from the labour force but fall into none of these categories as they are categorised as 'stay-at-home mothers'. There have been a number of studies which provided mechanisms for estimating the hidden unemployment levels e.g. by NIERC over the past 8 years. It would be useful if a proxy measure for 'hidden' unemployment be utilised and built into the Employment Domain measure. This would result in the adoption of some form of weighted score as opposed to merely a sum.

We propose research into proxy measures for hidden unemployment similar to those produced in the past. These then need inclusion in this measure alongside other measures of exclusion from the labour force.

We feel that the measures as proposed fail to incorporate the differentials in economic activity rates evident within the most recent employment data where there is almost 10 percentage points difference between religious groupings. The emphasis on employment and registered unemployment (JSA based), Incapacity benefit and a number of other benefits appears to ignore the fact that significant numbers of those within the potential workforce will not appear in any of these statistical groupings as they are technically unavailable for work. Is the actual economic activity rate not a useful measure as it includes all of the population not simply those who have to register for benefits.

Health Deprivation and Disability

BBI believes that some of the proposed changes will add particular benefit to the health deprivation and disability domain. The broadening of a treatment measure away from specific diseases and prescriptions (e.g. cancer and anti-depressants) towards life years lost and emergency admissions is a positive step. We also welcome the inclusion of a measure on suicide numbers.

However, BBI is concerned at the proposed exclusion of the measure of dental health. We feel that this measure should be retained and augmented with reference to 0-11 year olds with extractions and registered and not registered with a dentist.

If the measure is to use the prescribing rates of GP surgeries as a proxy health measure for anxiety based upon GP's practices' ward locations rather than the residency of their patients then we would have major problems with the data being generated. In Derry City few of the GP practices are now located within deprived wards and the majority of them draw their patients from throughout the city. If the measure is not based on the postcode of the patient then it will provide a poor data set for the indicators and again fail the test of robustness.

A further point of clarification is needed regarding the precise methodology employed by hospitals when dealing with emergency admissions. Is the suggested measure one that relates to 'admissions to the A&E' or to the hospital proper? We ask this because we are unsure that treatment within an A&E constitutes an admission or not.

Education, Skills and Training Deprivation

Whilst welcoming some of the changes within this domain BBI has grave reservations about others. Firstly we welcome the widening of the indicator on exclusion from Further Education to those aged 17-20. We welcome the adoption of sub-domains for youth and adult educational deprivation as this will allow more specific direction of policy and resources.

However, we are opposed to the restriction of the indicator measuring proportions of adults with no or low levels of qualifications to those aged below 60. The government has a policy of 'Life Long Learning' and thus we need to measure what is happening to people over 60 years of age in order to provide for their needs.

BBI feels that it is a serious mistake to conflate the two measures of no qualifications and low levels of education into one. We believe that these two measures deal with two different aspects of adult educational disadvantage and therefore need to be clearly identified.

A key question for NISRA is the choice of data. If for Key Stage 3 data the postcode of the second level school is used then we believe the results will be meaningless. To this end we have already examined such a dataset which shows the Brandywell Ward in Derry to have a 100% success rate in English and Maths because a Grammar school which achieves the highest academic results in the city happens to be located on the periphery of the Brandywell Ward. No other second level school exists within the ward so we are sure the results relate to this one school. Check data sought from the DENI shows that children living within the Brandywell Ward rather than being amongst the best in academic performance are in fact amongst the worst. We would welcome clarification on this issue.

Geographical Access to Services

Access to services inevitably has an impact of peoples' quality of life and for this reason BBI believes that access to and times, rather than distance to core public services should be the measurement by which deprivation is measured. It is highly questionable whether everyone can equally access public services. In some areas dentists are no longer willing to take on NHS clients. Any measure of geographical deprivation must be able to measure the number of people who are excluded from dental treatment as a result of this trend.

We are opposed to the exclusion on access to dentists, opticians, pharmacists, libraries, museums and social security offices in the measurement, these must be retained.

In looking at the issue of access to transport BBI is not convinced that the number of cars per capita is an appropriate measure and would suggest that this is replaced by the number of households with a registered car out of the total number of households.

Living Environment

We feel that whilst the three sub domains are important that an opportunity exists to add a fourth dealing with environmental issues. In addition we would suggest that instead of an outdoor physical environment measure that an alternative of a physical environment measurement to include some crime figures alongside a local area problem score would be more appropriate. BBI believes that this approach is a better alternative to the proposed Crime Domain.

We welcome the inclusion of indicators on household overcrowding and the acceptances under the homelessness provisions of the Housing Order. Homelessness is a critical problem across Ireland and the sub domain will recognise this.

BBI believes that its proposed Environmental sub-domain should include an assessment of road quality, proximity to Mobile Phone masts, and proximity to military bases which contain a number of electronic masts.

Crime Domain

BBI believes that the use of the proposed measure to measure deprivation is fundamentally flawed for a number of reasons.

- It is to be based on reported volumes of crime.

This is despite the undeniable fact that there remains a huge disparity in acceptance of the PSNI by the two main communities at political and social levels.

People, particularly in poorer areas, may not report a burglary, theft or damage because a) they do not have insurance that would allow them to claim and thus do not see or have any reason to report it, b) may feel 'why bother' as there is little chance of the police catching anybody.

The outcome of the proposed measure would likely result in a huge bias towards the protestant/unionist/loyalist community and towards more middle and upper class areas within the catholic/nationalist/republican areas. It would discriminate against many catholic/nationalist/republican areas as well as against working-class protestant/unionist/loyalist areas in which there is alienation from the PSNI.

Additionally it is conceivable that those involved in burglary, theft and criminal damage are likely to target those areas which are better off financially, as that is where they see themselves getting a greater reward from their activities. To use such crimes against those who have most, as a proxy indicator for deprivation, seems somewhat ludicrous.

Given that one of the criteria mentioned for the Indicators within section 5 is that they are statistically robust we cannot see how this specific criterion can be met.

In addition, recent survey work in Derry City by area based community safety partnerships within areas of social housing has shown that nationalist households especially in the lower income bands are unlikely to have contents insurance and consequently unlikely to report crime. If this is the case and crime reporting is strongly correlated with community identity then does this not raise an issue in meeting the requirements of Section 75 Equality legislation?

In relation to violence, much of the violence in Derry takes place in the City centre at weekends with large numbers of people leaving licensed premises at the same time. The City centre, with its licensed premises and shops is hardly an area of deprivation and the inclusion of violence within a crime domain is likely to give a false reading in relation to deprivation. In addition, the selection of burglary, violence, theft and criminal damage indicators raises questions about prioritising particular indicators. The priority appears to be damage to property (three of the four measures) over damage to persons. BBI would ask why this particular imbalance when the list of indicators was being drawn up. Does it perhaps reflect a

bias on those charged with bringing forward the proposals and if so this serves to reinforce the point made above about social acceptance/alienation of the current policing arrangements. It is essential that if the Noble measure is not to be significantly undermined that the proposed Crime domain be dropped.

The consultation asks whether such information as Weak Community Infrastructure should be included in the new deprivation measures. BBI believes that they should not. We say this for two reasons, firstly there is no agreed definition as to what constitutes weak community infrastructure and secondly there is no simple correlation between it and deprivation. There are places in every area which may not have a strongly developed community infrastructure but this may simply be because they do not feel that they need it because they are in affluent areas and can access whatever services that they need. Secondly, the term Weak Community Infrastructure has become increasingly synonymous with putting money in protestant areas. Whilst many protestant areas may require additional funding it is open to the government to offer that support and it has done so in the past, but to include it as part of a deprivation domain would in effect undermine the accurate and robust nature of the deprivation domains.

Conclusion

BBI welcomes the updating of the Multiple Deprivation Measure and the proposed mapping of it onto output areas. This approach will help to ensure that we have access to robust and up-to-date data.

A common theme within many of the domains is the ability to choose a relevant available data set consequent with the objective of accurately mapping deprivation. In the case of Education and Health domains we are concerned that the use of postcode data of the school and the GP surgery rather than the individual will significantly affect the rank ordering of the measure in question.

We have outlined our reservations about some of the indicators included in the various domains and in particular, we have serious problems with the inclusion of a Crime Domain. This domain must be scrapped and subsumed within the Living Environment Domain.

In recognition that we work within a council area that abuts the border we are keen to see a process of alignment between the various methods of collecting data so as to allow for comparability. In particular, the team tasked with the production of the new indicators need to study the potential to produce cross-border statistics which will dovetail into those proposed under the current index for the Six Counties.

This task becomes more significant due to the developmental role likely to be adopted by the three cross-border Corridor Groups (NWRCCG, ICBAN and EBRG) which have the responsibility to produce three Integrated Area Plans under the EU Structural Programmes. It is essential that combating poverty is not seen in an unnecessarily partitionist framework. Poverty in the border region is mirrored across the border and in addressing it effectively we need to be able to identify cross-border characteristics of poverty.

As such, it is of the utmost importance that the deprivation measures used are comparable and translatable into those available in the rest of Ireland. In light of this approach we would recommend that the team pursue coherence with the methodology of the cross-border deprivation analysis produced by ADM/CPA and NIVT in 2000.

We ask that following a production of the measures that the team produce an analysis to determine whether the new measures produce any major differences in the rankings from those of 2001. Any such analysis should also include a rigorous assessment of the domain and sub-domain rankings.

Bogside and Brandywell initiative welcomes the production of an updated and fair Multiple Deprivation Measure, however we are conscious that such a measure, however fair, is only as equitable as the manner in which it is utilised in policy-making and resource allocation.

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