

Ballymoney Borough Council's Response to the NI Multiple Deprivation Measures Consultation

In considering the consultation questions a definition of deprivation was first of all sourced in order to establish what exactly is being measured. The responses are therefore based on deprivation being defined as '*hardship resulting from the lack of basic material benefits*'. (The Oxford Dictionary, 2009)

Income Deprivation Domain

Whether the proposed changes from the 2005 domain are acceptable? Specifically:

Q1. Whether Adults and Children in Households in receipt of Housing Benefit should be included in the domain?

A1. It would have to be established whether all households in receipt of housing benefit are also entitled to other benefits where a count is already being made. If they are then this is merely a duplication of effort; if not, then a separate element may be required. It should be pointed out, however, that the previous indicator regarding Tax Credits might have been a more accurate indicator.

Employment Domain

Consultees are invited to comment on:

Q1. Whether, given the recommendations and changes to data availability, the proposed updated domain is acceptable?

A1. Given the limitations on the data available (especially in relation to hidden unemployment the inclusion of which would have been very useful and should be examined in more detail at the next review) the domain will have to be acceptable.

Health Deprivation and Disability Domain

Q. Whether an Emergency Hospital Admission Rate indicator should be included in the domain?

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- A. In deciding to include such an indicator, clarification may be required as to the nature of the admission, as emergency admissions occur for a variety of reasons and are not all necessarily linked to deprivation.
- Q. Whether Mental Health Hospital Admissions should be included in the mental health indicator?
- A. Yes, though clarification may be required as to what type of admissions occurred, i.e. result of trauma or related to a long-term mental health issue(s).
- Q. Whether a Children's Dental Health indicator should be included in the domain?
- A. Yes, but if this indicator is trying to link deprivation to poor oral hygiene then extractions may not be the best determinant, as extractions occur for a number of reasons other than poor hygiene, e.g. accidents or misalignment/overcrowding of natural teeth. A suggested alternative may be that as well as registration with a dentist, failure to meet the minimum number of visits per annum, e.g. 2 visits, be included.
- Q. Whether a Low Birth Weight Indicator should be included in the domains?
- A. There are many factors to low birth weight and clarification would be required prior to including such an indicator.

Education, Skills and Training Domain

Whether the proposed changes from the 2005 domain are acceptable? Specifically:

- Q1. Whether Key Stage 2 performance data should replace the 'proportions of children aged 11 and 12 not attending a grammar school'?
- A1. Yes, as there are limited places in grammar schools and a variety of reasons why a school is chosen. Key Stage 2 results would probably be a more reliable source for establishing educational performance, which may be a more reliable deprivation indicator.

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- Q2. Whether primary level absenteeism rates should be included in the domain?
- A2. Yes, as this may be a better indicator of social deprivation in younger families and is more likely to have a long-term impact in terms of the young person's future.
- Q3. Whether the proportion of primary school age pupils with Special Education Needs should be included in the domain?
- A3. Based on the definition given at the outset, Special Education Needs is not necessarily an indicator of deprivation, as the needs may arise as a result of other factors.
- Q4. Whether the destination of school leavers at 16 years indicator should include those not entering Further Education *or training*?
- A4. Yes, as some may be entering low paid employment but be outside the realm of benefits and some may not be doing anything.
- Q5. Whether three sub-domains should be introduced, decreasing the importance of 2001 Census data in the overall domain?
- A5. The 2001 Census data may be outdated in that there have been many changes over the past 8 years but it also was a comprehensive research of the whole population. In making any changes, consideration of the equality impact and ensuring that the data replacing it was equally comprehensive would be key.

Proximity to Services Domain

- Q1. Whether cross border service centres and accident and emergency hospitals should be included?
- A1. No, because these are the Northern Ireland Deprivation Measures and inclusion would blur key facts in relation to the provision of services for the Northern Ireland people by Northern Ireland. This could only be included if

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the services provided in the Republic to Northern Ireland people were on the same basis and paid for by Northern Ireland.

Q2. Whether a general service indicator should be included?

Yes, as to date there is the belief that by excluding some services in this domain, a true picture of deprivation cannot be established. This recommendation goes some way to addressing this gap.

Q3. Whether the food shop indicator should be broadened to include convenience stores?

A3. There is a concern that in considering this, it may mask an element of deprivation in that the cost of food in a large superstore and the cost of food in a local food-store can, accumulatively, be quite considerable.

Q4. Whether dentists, opticians and pharmacists should be combined into a single indicator?

A4. It is believed that combining these into separate indicators would mask an element of deprivation in relation to access to services, and that they should therefore be kept separate.

Q5. Whether council leisure centres should be included?

A5. Yes, as these provide a range of facilities and services to the general population.

Q6. Whether the service centres should be based on service provision rather than having a population of at least 10,000?

Yes, the justification is given in the recommendation in that quality and number of services is a better indication.

Q7. Whether the calculation of proximity should be based on time rather than distance?

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- A7. Clarification is required in relation to the calculation on journey time rather than distance. E.g. a taken journey using isolated rural roads in summer then in winter may reveal a wide variation in times, as may urban travel during rush hour and outside of it. Have a number of variables been included in the calculation of time?

Living Environment Consultation Questions

- Q1. Whether Central Heating information from the 2001 Census and SOA level housing stress should be replaced by the Decent Home Standard?
- A1. Yes, as this is a more comprehensive measurement to allow for other considerations, i.e. meets the minimum Fitness Standard; is in a reasonable state of repair; has reasonably modern facilities and services and provides a reasonable degree of thermal comfort (e.g. a home may have central heating but not be of a decent standard).
- Q2. Whether the Housing Health and Safety Rating System should be included?
- A2. There is some concern that using defects in dwellings and evaluating the subsequent risk to the health and safety of occupants, neighbours and passers-by will duplicate some aspect of the Decent Home Standard in that should a decent home have defects that pose a risk?
- Q3. Whether Household Overcrowding information from the 2001 Census should be excluded?
- A4. The rationale for excluding the 2001 Census data in that it is out of date and inaccurate is reasonable. However, it states that '*it is proposed that the household overcrowding measure is excluded from the Housing Access Domain*' and this does raise concern as household overcrowding is an indicator of deprivation. Therefore, until an alternative is established, it is believed the use of the Census 2001 and the House Condition Survey 2006 should be retained as an indicator.

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Crime and Disorder Domain

Consultees are invited to comment on:

- Q1. Whether, given the recommendations and changes to data available, the proposed updated domain is acceptable?
- Q2. There is a concern that none of the recommendations regarding *'examining the different reporting rates of population groups; expanding the Northern Ireland Crime Survey (NICS) and District Policing Partnership (DPP) surveys to enable modelling of results to small area level; developing a robust measure of domestic violence using data from voluntary organisations; and refining the community safety indicators'* are actually being instigated at this stage and that the only changes are name changes to indicators. It would beg the question as to why consult at all.

2nd November 2009