

Development Department



Our ref.: BCC / MDM 2004 / Response

Being dealt with by: Patricia Elliott

Your ref.:

Ext. 3620

Date: 05 November 2004

Neighbourhood Statistics Unit
Demography & Methodology Branch
NISRA
McAuley House
2-14 Castle Street
BELFAST
BT1 1SA

Northern Ireland Multiple Deprivation Measure 2004

Dear Sir / Madam

Further to my letter dated 29th October 2004 regarding the public consultation on Multiple Deprivation Measure 2004 I am writing to confirm that the contents of the Belfast City Council response document were adopted by Council at its meeting of 1st November 2004.

Should you have any queries regarding the content of this response please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Patricia Elliott'.

Patricia Elliott
Policy and Research Manager

Marie-Thérèse McGivern

DIRECTOR OF DEVELOPMENT

BELFAST CITY COUNCIL
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Northern Ireland Multiple Deprivation Measure 2004

Dear Sir / Madam

Belfast City Council welcomes the opportunity to participate in Multiple Deprivation Measure 2004 consultation process and in particular to respond to the proposed changes to deprivation domains, indicators and statistical output geography of Super Output Areas.

Please find enclosed a response from Belfast City Council to the consultation document. This is a provisional response dependent on adoption at the November 2004 meeting of the Council, and should therefore be considered as a draft until approved. When this process is complete I will contact NISRA in writing to confirm the response has been ratified by Belfast City Council.

Should you have any queries regarding the content of this response please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patricia Elliott'.

Patricia Elliott
Policy and Research Manager

Enc. Belfast City Council consultation response

Marie-Thérèse McGivern

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Northern Ireland
Multiple Deprivation Measure 2004:
Consultation Document
Belfast City Council Response

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1. Introduction

This paper outlines Belfast City Council's response to the review of **Multiple Deprivation Measures for 2004** (MDM 2004) which will replace (what is commonly known as) the Noble Indices. The Council's central premise is that areas of deprivation must be effectively and efficiently identified across Northern Ireland and that issues with the current Noble indices should be rectified.

The revised **MDM** will be used to identify those deprived areas most in need and, accordingly, will heavily influence regeneration spending and intervention activity. As such it is crucial that MDM accurately measures real deprivation. While the existing Index contains much that is useful, it has demonstrated significant weaknesses which underestimate the scale and degree of deprivation in Belfast and other parts of the region.

While it is important that there is on-going consistency with the existing approach to measuring deprivation, refinements are urgently needed to better highlight deprivation and need.

With this in mind, the Council believes that the chosen domains and indicators should be based on the most accurate and up-to-date information available and must have direct relevance to the measurement of deprivation. While improvements to the quality of indicators are needed, the new MDM must be historically comparable with the existing indices.

2. Policy for using MDM

Currently, central government decisions on policy direction and programme funding are being made on the basis of the Noble indices. (For example, the DSD **Neighbourhood Renewal Programme** targets the top 10% most deprived wards within the region and the programme's resources are allocated accordingly.) Because it will be so influential on government decision-making, it is critically important that the measures for MDM 2004 are established correctly from the outset.

It is also essential that central government establishes clear **policy guidelines** to establish how MDM will be used in targeting future resources. The government must also provide detailed guidance on the correct application of MDM in such situations. In determining the distribution of funds government departments should routinely utilise all available information from MDM 2004 to ensure funding decisions are appropriately informed.

3. Specific comments on the proposals

Belfast City Council has commented upon:

- a) **The proposed indicators**
- b) **The proposed new geography of Super Output Areas (SOAs)**
- c) **The weighting of domains**
- d) **Other relevant points**

Comments concerning each domain are included at **Appendix 1**.

a) **Proposed indicators**

Belfast City Council has a number of concerns about the proposed indicators including their operational use and scope.

Historic data

There are concerns about over-reliance on historic data. Much of it, including the 2001 Census, uses a 'snapshot' approach (i.e. the information is recorded on one particular day). Such information becomes dated very quickly – for example, the Census data was two years old.

A mechanism should be established to allow on-going updates to the key datasets that inform the measures of deprivation.

Scope of indicators

Belfast City Council has concerns about the scope of indicators used in each domain. For example, both the **Crime** and **Living Environment** domains appear to be restricted to indicators that already exist rather than identifying new measures such as access to leisure and recreational facilities. (see appendix 1)

The Council acknowledges that robust statistics are not always available for a proposed indicator or that they may not be available on a Northern Ireland-wide basis, both of which are essential in developing accurate region-wide indicators. However, gaps in the scope and existence of indicators should be identified and early preparations made to gather information for generating future deprivation detail.

b) The proposed new geography – Output Areas (OAs) & Super Output Areas (SOAs)

Belfast City Council recognises the importance of using statistical areas that describe the nature of deprivation in Northern Ireland on a fine geographical basis. Such a development will begin to address the inability of the existing indices to identify smaller pockets of deprivation.

The Council welcomes the proposed use of 1992 Ward Boundaries alongside the 2001 Census information as this will match the existing operational and service delivery boundaries of statutory agencies (including local authorities) and will provide an updated current statistical base for area analysis. However, there may be the potential for confusion with the introduction of yet another geographical statistical area.

Having said this, the Council welcomes the move to the use of OAs and SOAs. However, the Council remains unclear on two main issues. The first is how the new SOAs will relate to existing boundaries (e.g. Ward Areas).

Given the ongoing work of the Council, and other statutory agencies, (e.g. the recently released DSD Neighbourhood Renewal strategy '*People and Place*' and subsequent creation of Neighbourhood Renewal Areas and the Urban II programme) it will be important to clarify how the proposed new SOA boundaries will map on to existing operational and service delivery boundaries within Belfast and the region as a whole.

The Council's second concern on this issue is whether OA data will be made available - as the identification of small discreet areas of deprivation *within* wards is likely to remain difficult at the SOA scale.

Further consideration should be given to smaller scale SOAs similar to the lower-layer SOAs adopted in England and Wales (where the average population is 1,500 compared to a target of 2,000 for NI). This would enable local area analysis, and ensure more effective intervention and accurate targeting of resources to tackle deprivation at the local level.

c) Domain weighting

With regard to the twofold choice put forward in the consultation document the Council would support '**Weights B**'. This gives a 10% weighting to health deprivation and disability, education skills and training deprivation,

geographical access to services, crime and living environment, and 25% weighting to income deprivation and employment deprivation.

d) Relevant comments

English indices

There is a concern that MDM 2004 attempts to replicate the English indices without statistical information being available, thus lessening future potential benefit for cross-referencing the deprivation measure results between NI and GB. This is part of the wider issue around availability of statistics highlighted below.

Next review of MDM

Belfast City Council would note the need to commence preparations for the next review of deprivation measures in Northern Ireland. Given the long lead-time required to gather new statistics and to consult stakeholders on future review mechanisms, discussion/action forums should be created to assist ongoing discussion between NISRA and end-users of the deprivation measure.

Benchmarking MDM

The Council would suggest that consideration is given to how the new MDM indices can be benchmarked. This would facilitate comparisons across time of real change in deprivation. Consistency in reporting is required for meaningful benchmarking to occur (both historically for comparisons with GB) and will require review planning and ongoing discussions to take place. While it commends the move to the new geography, the Council seeks clarification concerning the potential problems of comparing data between the old and new boundaries.

Review of Public Administration

The ongoing Review of Public Administration (RPA) in Northern Ireland has the potential to impact on current operational boundaries. The current position of the RPA would suggest that local government boundaries will be modified following the review. **The Council seeks clarification on what mechanisms will be put in place to take account of future changes to boundaries brought about by the RPA.**

4. Funding allocation

Belfast City Council notes the potential impact on funding streams following the introduction of MDM 2004. Statistical results from the new measure may directly impact on current delivery and funding structures set in place under Deprivation Measures 2001. For example, funds from ERDF, UBRAN II and Peace II all target areas previously defined by Noble through Deprivation Measures 2001. Commitments have been made to financially support projects and programme delivery in these areas.

Where a commitment has been made to support projects or activities under Deprivation Measures 2001 this should continue without prejudice to potential funding allocations resulting from the output of MDM 2004. The Council would note that due consideration must be given to how MDM 2004 will be phased in to replace the existing measures of multiple deprivation.

5. Concluding remarks

Belfast City Council's comments are intended to be constructive and positive and the Council looks forward to working with NISRA to ensure that the MDM 2004 (and consequent measures) will effectively identify those people in Belfast who most need assistance.

Appendix 1

Income Deprivation

As noted in the consultation document, the domain would ideally capture the proportion of residents in an area living in households where the equivalised income is below 60% of the UK median. Consideration should be given to how this indicator can be more appropriately attained.

The consultation document observes that an income deprivation affecting older people (IDAOP) measure could be created. With the increasing importance of this issue Belfast City Council recommends that a measure be fully incorporated in MDM 2004.

Employment Deprivation

Belfast City Council welcomes proposals to identify all those of working age involuntarily out of the labour market through this domain.

Inclusion of incapacity benefit and severe disablement allowance claimants is important to generate a full picture of those excluded from the world of work.

Clarity on exactly what results are produced by which measurement, for example New Deal and New Deal 25+, will be useful in effectively targeting resources to population groups.

Health Deprivation and Disability

A correlation exists between inter-communal conflict and health deprivation and disability, in terms of creating areas of deprivation across Northern Ireland. Belfast City Council notes that a useful indicator would reference the level of health impact on communities.

Belfast City Council would encourage NISRA to investigate with the NIO Victim's Liaison Unit ways in which to collect data on the impact of health deprivation on communities on a Northern Ireland-wide basis.

A measure of dental health was included in MDM 2001 but does not feature in MDM 2004. Dental visits are an important means of identifying ill health at an early stage. Removing this indicator reduces the capacity of MDM 2004 to identify areas where quality of life is impaired by poor health.

Given the fact that the demographic composition of the population differs between particular wards and the probability of having poor health varies systematically with age, due consideration should be given to the age structure of the proposed geography [SOA's].

Education, Skills and Training Deprivation

It should be recognised that low levels of educational attainment often correlate with health and income deprivation.

Ensuring that proposed indicators within this domain are sufficiently broad and detailed to capture the necessary data is therefore crucial.

The Council welcomes the proposed changes in domain structure to separate children/young people attainment from working age adults. This will enable the demographic changes noted in the consultation document to be better captured.

Due consideration should also be given to the disjunction between school location and pupil residence.

There is concern that the historic nature of the indicators will not portray an accurate picture of current deprivation in this domain. Statistics are available for a GCSE/GNVQ points score over the period 1999/2000 to 2002/2003. The proposed indicator should be updated to include this information.

The consultation document proposes that proportions of working age adults (aged 25-59) in an area with no or low levels of qualification be included as an indicator in this domain. However, commencing the age band at 25 years may not truly represent the education, skills and training profile in many deprived areas. Belfast City Council suggests that further consideration should be given to an age band that begins at 30 years.

Indicators of educational deprivation earlier than Key Stage 3 should be included in MDM 2004 as evidence of deprivation can emerge early in a child's education. Actions to address educational deprivation can prove more effective if identified at an early stage. Belfast City Council recommends that data from Key Stages 1 and 2 be included as indicators in this domain.

Belfast City Council further recommends that data relating to the number of children who had been identified by their schools – either at primary or secondary level – as requiring special educational facilities be included in this domain.

Geographical Access to Services

Belfast City Council would highlight that a measure of distance to a service is not necessarily a measure of accessibility of that service given the community geography of the city and Northern Ireland generally.

Measuring access to services on a geographical basis only will not provide a true reflection and distort the index. The domain should also take into account

other barriers to access to services including segregation and perceptions of territory and safety.

Furthermore, a declining population caused by demographic change is a measure of deprivation, for example, where a dentist or pharmacist chooses to locate on the basis of catchment area.

Belfast City Council would encourage NISRA to consider analysing across Northern Ireland the impact of both visible and invisible interfaces, which influences consumption of services by the community.

The proposed indicator outlining access to transport that draws data from DVLNI vehicle registrations 2004 is flawed and may not generate a true reflection of car ownership in a given area. This is particularly acute in areas that contain a large number of car showrooms where cars are registered as owned in these areas. Belfast City Council recommends that this discrepancy be addressed and data revised to ensure that only private vehicles registered by residents are included.

Consideration should be given to removing 'geographical' from this domain title.

Living Environment

Indicators noted in the consultation document are not a representative measure of the impact of the living environment on quality of life; other aspects of the living environment should be considered to ensure a global picture of deprivation under this domain.

Belfast City Council notes the ongoing work within Government to generate a measurement that will define weak community infrastructure and would wish to comment on any measures prior to inclusion in Deprivation Measure 2004.

Community segregation is a further indication of the living environment, with a stable society demonstrated by integration of religious and cultural groups.

The Council proposes that households per hectare should be included as a measurement of deprivation in the living environment to demonstrate occurrences of overcrowding and amenity.

Crime

Belfast City Council would note the fear of crime should be a measure of deprivation, not only actual reported crime.

Although it is accepted that information is not yet available at an appropriate level across Northern Ireland to record fear of crime, Council would want to stress the limitations posed by using only recorded crime figures.

Belfast City Council would recommend that statistics for recording crime against vulnerable persons, for example the elderly, should be defined at small area level for inclusion in this domain.

The Council would want to further note the emergent use of Hate Crime legislation, covering sectarian and race related crime in Northern Ireland, which should be captured as an indicator in both the crime and living environment domain.