

# **Cookstown District Council**

## **Response to Consultation on the Northern Ireland Multiple Deprivation Measure 2009**

**4 November 2009**

## GENERAL COMMENTS

Cookstown District Council welcomes the opportunity to respond to the proposed updating of the NI Multiple Deprivation Measure. We understand, however, that this is not a full review of the Measure and that NISRA plan to proceed with this when the 2011 Census data is available and the new local government boundaries are in place post-2011.

The Noble team made a series of recommendations as part of the last NI Multiple Deprivation Measure (NIMDM) process, on the understanding that these issues would be considered in future, as and when suitable data became available. We welcome the process, through this update, of re-examining those and complying with them wherever this has subsequently become possible.

## INCOME DEPRIVATION DOMAIN

As the income deprivation domain relies so heavily on benefits data, benefit uptake rates are of crucial importance, as recognised in the recommendations of the NIMDM 2005 Report. NISRA's Consultation Document notes that the Family Resource Survey (FRS) does not have a sufficiently large sample size in Northern Ireland to provide robust data. Cookstown District Council would support the inclusion of this data in any future versions of the NIMDM to ensure that low income households in work, but not receiving benefits, are included.

In addition, Council would welcome the inclusion of a child-specific multiple deprivation measure, following the 2005 Report's recommendation. With the ongoing levels of child poverty in Northern Ireland, Council believes that NISRA should certainly include this measure in the next review of the NIMDM.

Council supports the inclusion of indicators relating to Income Support, State Pension Credit and the income section of the Employment and Support Allowance to reflect the changes in the benefits system.

### Should adults and children in households in receipt of Housing Benefit be included in the domain?

Cookstown Council agrees with the proposal to include adults and children in households in receipt of Housing Benefit to capture those who may not be claiming other benefits but who are renting and have an income below a minimum level. People on low incomes in receipt of tax credits (which also count as income) may not actually qualify for Housing Benefit. Without the required data on tax credits from HM Revenue and Customs, there is a risk that these people will not be counted in this indicator.

It is extremely unfortunate that the NI Multiple Deprivation Measure (NIMDM) can, since 2007, no longer access the tax credit data from HM Revenue and Customs (HMRC). This means that data relating to Working Tax Credit and Child Tax Credit cannot be included, which will undoubtedly have an adverse impact on the measurement of deprivation in Northern Ireland. Council would urge the DSD Minister to work with HM Revenue and Customs to secure the future inclusion of this important information as recommended by the Noble Report of 2005.

## EMPLOYMENT DEPRIVATION

### Is the proposed updated domain acceptable?

Council understands that NISRA had considered using the Labour Force Survey and Family Resource Survey as possible sources for 'hidden unemployment' but that survey samples were not robust enough so this will not now be included. As potential 'hidden unemployment' can be a key factor in identifying deprivation Council finds this outcome disappointing and would urge NISRA to work with the relevant agencies to ensure these statistics can be incorporated into the next Measure.

Council otherwise supports the proposed updates to this measure and welcomes the inclusion of those claiming the new Employment and Support Allowance alongside those claiming Incapacity Benefit.



## HEALTH DEPRIVATION AND DISABILITY DOMAIN

### Should an Emergency Hospital Admission Rate indicator be included in this domain?

Cookstown District Council is cognisant of the work that has been done since 2005 on emergency admissions and of the need to eliminate any rural bias but would question the minimum-stay definition of four nights in this indicator.

### Should Mental Health Hospital Admissions be included in the Mental Health Indicator?

Council welcomes the inclusion of mental health admissions alongside mood and anxiety prescription information and suicide rates. We welcome the inclusion of accurate patient location information but would recommend NISRA clarifies how it will ensure data collection is not skewed by the concentration of communal locations such as Nursing and Residential Care Homes.

### Should a Children's Dental Health Indicator be included in this domain?

Council fully supports the inclusion of this indicator.

### Should a Low Birth Weight Indicator be included in this domain?

Council fully supports the inclusion of this indicator.

While we fully support the inclusion of the indicator 'People registered as having cancer' Council also believes that the quality of information provided by this Domain would be greatly enhanced by the incorporation of statistics of other life-limiting illnesses such as those suffering from for example, heart disease, stroke or Parkinson's disease.

NISRA has advised Council that these are not included due to the lack of available robust data at small area level. We would encourage NISRA to liaise with the DHSS&PS and other relevant agencies to facilitate the collection of such data to enable inclusion in future reviews as its omission detracts from the robustness of this Domain.

## EDUCATION, SKILLS AND TRAINING DEPRIVATION DOMAIN

### Should Key Stage 2 performance data replace 'the proportions of children aged 11 and 12 not attending a grammar school'?

Cookstown District Council welcomes the extension of performance data to primary schools, rather than using the proxy indicator of proportions of years 11 and 12 pupils not in grammar schools and agrees that this change introduces a more accurate measure of primary school attainment levels.

### Should primary level absenteeism be included?

### Should the proportion of primary school age pupils with Special Education Needs be included?

In addition Council welcomes the extension of absenteeism and Special Education Needs data to primary school level.

### Should the destination of school leavers at 16 years include those not entering Further Education or training?

The extension of the indicator on destination of school leavers, which previously recorded only those not entering Further Education, to include those not entering training, will provide a more comprehensive picture more in keeping with the current system.

The 2005 Report had recommended the consideration of alternatives to Census 2001 data for calculating education, training and skills deprivation in working age adults. Council is disappointed that, again, the sample size prevents using the Labour Force Survey to calculate adults with *no* qualifications, an indicator which would have made an extremely useful contribution to this measure.



Should three sub - domains be introduced, decreasing the importance of 2001 Census data in the overall domain?

Cookstown District Council agrees with the proposal to form three sub-domains within this domain.

Along with the data on adults in NI with no qualifications, Council would strongly recommend NISRA considers the possibility of including data on Adult Literacy in future NIMDM updates or even as part of the 2011 Census, but appreciate the need for data to be sufficiently robust. This would be an extremely useful indicator to incorporate into this domain to more accurately reflect education deprivation.

## **PROXIMITY TO SERVICES**

Should cross border service centres and accident and emergency hospitals be included?

Cookstown District Council welcomes the recommended inclusion of cross border data for travel time to service centres and accident and emergency as people living in border areas may choose to use the closest service.

Should a general service indicator be included?

Should Council Leisure Centres be included?

Should dentists, opticians and pharmacists be combined into a single indicator?

We agree with the combination of opticians, dentists and pharmacies into a single indicator as they are important services, and it is not useful to have a very large number of indicators. Likewise, we agree with the inclusion of council leisure services, financial services and general services indicators.

Should the food shop indicator be broadened to include convenience store?

The NIMDM 2005 used supermarkets with more than fifty employees from the Census of Employment. In response to a query about how NISRA now proposes to define a 'convenience store', NISRA has advised Council that *'The dataset being used for this indicator lists supermarkets and convenience stores at which food can be bought, and it is proposed that all such establishments are included'*.

Council strongly disagrees with the inclusion of this new, broader definition. Smaller shops (or garages as may be the case for many) tend to have higher prices and so people on low incomes will still have to travel larger distances, if they have access to transport, to purchase food at lower prices from a larger shop. Council believes that proposed inclusion of all 'food stores' will not provide an accurate picture of true 'proximity' for many.

Should service centres be based on service provision rather than having a population of at least 10,000?

Council agrees that population size is not an adequate criterion for service provision and welcomes the inclusion of the newly available data on service centres in smaller settlements.

Should the calculation of proximity be based on time rather than distance?

Council fully agrees with NISRA's proposal that travel times, rather than distances, are a more accurate measurement of proximity. A small distance on a rural road may take substantially longer than a large distance on a motorway and we believe that this proposed change better reflects the reality of people's lives.

The 2005 Noble Report had recommended the inclusion of Translink information on proximity to bus and train transport. However, due to the fact that Translink does not have an integrated system to record this data, this cannot now be included. As information on frequency and timing of transport is a key indicator of proximity in this Domain, NISRA should lobby Translink's Department, DRD, to remedy this in time for the next review of the NIMDM. We note that, as a result the available car ownership data is rendered unusable without the corresponding public transport data.

Council notes that broadband speed data was not available for all areas of Northern Ireland and would request that this can be included in the next review of the Measure.



## LIVING ENVIRONMENT DOMAIN

Should Central Heating information from the 2001 Census and SOA level housing stress be replaced by the Decent Home Standard?

Should the Housing Health and Safety Rating System be included?

Council agrees with the inclusion of the Decent Home Standard to replace central heating information.

We understand that the introduction of a separate fuel poverty indicator would duplicate information already contained in the Income domain and the Living Environment Domain.

Should Household overcrowding information from 2001 Census be excluded?

Council agrees that using 2001 Census data on household overcrowding is too out of date but would recommend NISRA includes this in the next NIMDM update, with data from the 2011 Census. Caution should also be taken in the recording of homelessness data and people may present themselves as homeless where there are refuge centres and not close to their last place of residence. This could potentially distort the picture of housing need.

## CRIME AND DISORDER DOMAIN

The 2005 Report recommended examining the NI Crime Survey and District Policing Partnership Surveys to see if they could provide information at a small area level and Council understands that this has not been possible due to the sample sizes concerned. NISRA should liaise with the relevant agencies involved in directing/collating these Surveys to ensure that future statistics can be included in this Domain.

Council supports the inclusion of five years of data, instead of three, to decrease the impact of "one-off" or uncharacteristic events in the results.

It is apparent that the under-reporting of domestic violence is still an issue. Council agrees with NISRA that PSNI recorded crime data should continue to be used as it remains the most robust source of small area information on domestic violence.

## SUMMARY

Cookstown District Council thanks NISRA for this opportunity to respond to the proposed updates to indicators as outlined. However, while fully recognising that the role of NISRA's Deprivation Team is to collate and provide statistics which indicate levels of deprivation across Northern Ireland, we would request that NISRA works with government departments and agencies to ensure that the use of the NIMDM is examined in conjunction with a range of other area-specific information to gain the most accurate picture of deprivation.

Council would strongly urge NISRA to advise government departments and agencies that the NIMDM is only one of many measures of deprivation and should not be used as the sole source to inform the development of policies or the delivery of funding programmes.