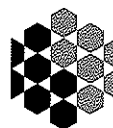


FROM THE MINISTER



Department for

**Employment
and Learning**

www.delni.gov.uk

Adelaide House
39/49 Adelaide Street
Belfast
BT2 8FD
Tel: 028 9025 7791
Email: private.office@delni.gov.uk

Sammy Wilson MP MLA
Minister of Finance and Personnel
Craigantlet Buildings
Stoney Road
BELFAST
BT4 3SX

12 September 2009

Dear Sam,

Northern Ireland Multiple Deprivation Measure 2009: Consultation Document

You wrote to Ministerial colleagues on 4 August regarding the above.

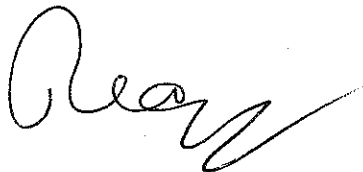
I would offer the following comments:

- Page 5 - is the Super Output Area (SOA) (population size circa 2000) basis to the geography of the measures adequate?
- Is it possible that a unit as large as a population of 2000 may disguise some (small) pockets of poverty? It could be that the smallest data units (the Census Output Areas of circa 340 people each) be built up into something smaller than the present SOAs (say to about 1000 population)?
- Page 8 - should housing benefit claimants be included in the income measure? Is there any notable difference here with respect to community background?
- Page 15 - I am concerned about the use of Special Education Needs (SENs) in the education domain. Recent years have seen a substantial growth in the numbers of SENs pupils (and, at the same time, the numbers look suspiciously different across the ELB areas). I wonder if all of this is a proxy for "real" educational disadvantage.



INVESTOR IN PEOPLE

- Page 18 - it does seem unsatisfactory that the "proximity to services" domain cannot include any measure relating to public transport (or private car ownership). What about a count of the number of bus stops/train stations within each SOA?
- Page 23 - being aware of the experience in parts of Belfast, I would suggest they consider use of % in Houses in Multiple Occupation (HMOs) as an indicator of "overcrowding".
- It would also be worth reviewing all the measures to check there is no bias against rural areas (interestingly, they exclude numbers of hospital emergency admissions for that reason).



SIR REG EMPEY MLA
Minister for Employment and Learning