



Your Ref:

Our Ref:

Date: 29 October 2004

Being dealt with by: Chief Executive's Department

Email:

Ms Janis Watson  
Neighbourhood Statistics Unit  
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Northern Ireland Multiple Deprivation Measure 2004: Consultative Document

Dear Ms Watson

I refer to your letter dated 24 September 2004 regarding the above consultative document.

The issue was raised at a recent meeting of the Planning and Public Services Liaison Committee and I now enclose a copy of the Council's response for your attention.

Yours sincerely

*pp. B Shahaney*  
**Danny McSorley**  
Chief Executive

Enc

# OMAGH DISTRICT COUNCIL:

## A Response to the NI Multiple Deprivation Measure (NIMD) 2004 Consultation

### 1.0 Introduction And Background

- 1.1 This paper draws together the response of Omagh District Council to the NIMD 2004 Consultation Paper. The Council's response is based on:
- ⇒ its understanding of the key local deprivation issues; causes; and effects in Omagh
  - ⇒ its experience of using the previous NIMD 2001 and the "Robson" Report
  - ⇒ a facilitated workshop for Councillors and officers held on 18<sup>th</sup> October 2004.
- 1.2 The report reflects the structure/sequence of the Consultation document but concludes with a number of general, strategic points.

### 2.0 Submissions Re The Proposed Domains

- 2.1 The Council's comments regarding each of the domains are presented below:

#### **Income**

- 2.2 The Council is concerned about the total reliance on benefits to provide the indicators in this domain. As a result of this, it believes the domain:

- ⇒ ignores the reality that significant numbers of deprived/disadvantaged people aren't – for whatever reasons – included in the benefits “net”
- ⇒ takes no account of people on low wages
- ⇒ will inadequately reflect the income deprivation of the farming community, particularly after the decoupling proposals are put into effect.

2.3 Benefits uptake is to a great extent a function of people's awareness of those benefits. Areas/communities which include good benefits awareness/Citizens' Advice services are likely to enjoy higher levels of benefit uptake. Rural areas tend not to have these services available. Since this fact is not picked up under the proposed Geographical Access to Services domain, rural areas could be said to be doubly disadvantaged on this issue alone.

2.4 The Council feels the domain needs to be supported by a number of actual income-related indicators: otherwise it is in effect a Benefits rather than an Income domain.

#### **Employment**

2.5 The same concerns about reliance on benefits (and benefit-related programmes) arise here. Among the areas that should be included in this domain are:

- ⇒ something to reflect the fact that for many people in Omagh (and in the west generally) their work is in a location far removed from Omagh
- ⇒ the “post-decoupling” realities for many farm families
- ⇒ the underemployment levels that persist in many rural areas and the associated issues of “unaccounted and unpaid” inputs from members of farm families.

### **Health Deprivation and Disability**

- 2.6 The Council feels that more use should be made of the many measures of health status that are currently available, even if these cannot be cascaded down to Sub-District levels. Areas that the domain should include as fundamental building blocks are:
- ⇒ dental health (not least because dental charges are impacting on many disadvantaged/deprived peoples' ability to use dental services and thereby maintain their dental health)
  - ⇒ coronary disease
  - ⇒ low birth weights.
- 2.7 Finally the Council is adamantly opposed to the use of emergency admissions to hospital as an indicator as it is biased in favour of those parts of NI that have close-at-hand and accessible emergency hospital facilities.

### **Education, Skills and Training**

- 2.8 Councillors would welcome an explanation of the rationale underpinning the "Proportions of Years 11 & 12 pupils not in a grammar school" indicator.
- 2.9 The Council would wish to see the focus on adults' educational achievement expanded. A particular problem in rural areas relates to the numbers of people who complete third level (or equivalent) education in places other than their home areas but who then don't return home. An over-emphasis on primary and second-level educational performance can mask this particular problem.

### **Geographical Access to Services**

- 2.10 Access to services and to facilities; assets; and resources that can prevent or at least ameliorate the effects of deprivation and disadvantage is a fundamentally important issue here. If one use of

NIMD 2004 is to influence decisions about the shape and content of various public services, then the accessibility of those services is a central concern.

2.11 Among the specific points the Council wishes to make are:

- ⇒ arithmetic distance is an essentially worthless measure of accessibility. The Council is for example aware of a study that showed that, for a person living in Dromore (nine miles from Omagh), and who relied on public transport, a twenty-minute mid-morning appointment at the Tyrone & Fermanagh Hospital in Omagh used up over seven hours of that person's day
- ⇒ the number and range of services included in the domain are too narrow. The accessibility of education; employment; benefits services; banks; leisure and recreation; and GP out-of-hours services should be included
- ⇒ more clarity is needed about what constitutes a general food store. Most surviving rural food stores offer a range of goods that falls far below those offered by the larger urban-based stores ... and, invariably, at higher prices. This indicator needs to be very carefully thought out and explained and a consensus obtained as to its acceptability.
- ⇒ given the increased use of IT/ICT in accessing services, the availability to people/areas of that technology should be factored in
- ⇒ access to affordable childcare is another important issue, not least because of the input it can have on people's ability to be in work

2.12 The Council also has concerns about the proposal to give equal weight to the car and public transport indicators. As currently proposed, the public transport measures relate to the availability of a subsidised public service. The car measure however relates to a

wholly privately-funded resource, which for many rural people in particular is actually a significant drain on already-stretched resources. NIMD's stance here needs to be revisited.

### **Living Environment**

- 2.13 The Council believes that this domain should be broadened out beyond its proposed reliance on housing-related indicators. Areas that could usefully be considered include:
- ⇒ "physical infrastructure" provision (eg mains water and electricity; sewerage; roads of a certain quality; broadband etc)
  - ⇒ "social infrastructure" provision (eg availability of community facilities and the strength of the community infrastructure)
- 2.14 The Council is also concerned that the use of pedestrian and cyclist casualties as an indicator will skew the domain in favour of urban areas.
- 2.15 Returning to the housing-related element of this domain, the Council feels that housing unfitness, as measured by the NIHE Home Condition Survey, should be included as a core indicator. For some thirty years housing unfitness levels have been a key driver of housing policy in NI. Unfitness levels persist at unacceptably high levels in many rural areas across NI and should be factored, in their own right, into this domain.

### **Crime**

- 2.16 As local representatives in touch with their constituents on a day-to-day basis, Councillors are fully aware of the significance of this issue. However four points need to be made here:
- ⇒ for many people the **fear** rather than the actual incidence of crime is the key concern
  - ⇒ for a variety of reasons, many crimes - including those in the categories proposed in NIMD 2004 - are not reported to PSNI

- ⇒ there needs to be total confidence that the incidence of certain types of crime – especially burglary – does not reflect the affluence rather than the deprivation of an area
- ⇒ the use of offender-related data as an indicator here should be revisited.

### 3.0 Submissions Re Data Time Point Denominators, Geography And Spatial Scale

- 3.1 The Council welcomes the use of up-to-date data to underpin NIMD 2004 but equally urges NISRA to commit now to updating NIMD at fixed times in the future, ideally in the first instance not later than 2006/07.
- 3.2 The arguments in favour of using SOAs are understood but at a minimum, the Council believes that NIMD 2004 figures should also be available at Ward level. Wards have a significance in political and other terms and need to have a presence within NIMD 2004.

### 4.0 Submissions Re Methodology

- 4.1 The Multiple Deprivation Measure concept has value as an overall, high level comparator ... but that value depends on both the “rigour” of the various domains to start with and the extent to which the Multiple Measure’s component parts/domains are properly weighted and balanced against each other. As pointed out earlier, the Council has grave reservations about some of the weightings proposed. It also has concerns as to the extent that some of the domains (as proposed) – eg Income – actually provide a meaningful picture of those deprivation areas/issues.
- 4.2 The Council would want to repeat its views that:

- ⇒ the Health and Disability domain deserves a higher weighting
- ⇒ the Geographical Access to Services domain deserves a significantly higher weighting
- ⇒ there are some grave weaknesses in the make-up of the Crime domain to start with and, regardless of those, the Council could not accept Crime being given an equal weighting with Geographical Access (as is proposed under Weights Option B).

## 5.0 General, Strategic Submissions and Conclusions

5.1 Moving away from its detailed submissions, the Council wishes to make six general or strategic points:

- ⇒ NIMD 2004 needs to be subjected to a robust rural-proofing exercise
- ⇒ in addition, the Measure's focus on the spatial aggregations of deprivation/disadvantage can militate against rural communities where deprivation and affluence are frequently inter-mixed
- ⇒ many of the proposed indicators don't include 16-18 year olds and over 60/64 year olds: this surely has implications in terms of Section 75 requirements
- ⇒ disability as a cross-cutting issue does not appear to be adequately emphasised within the domains and indicators: many people with disabilities for example won't be picked up by the various benefit-based indicators because they're not eligible for them



- ⇒ NIMD 2004 and New TSN need to work, and be seen to work, hand-in-glove. The Council is concerned that this does not appear to be the case with a significant divergence between the indicators presented in NIMD 2004 and those outlined in the “New TSN: The Way Forward” consultation document
- ⇒ there is significant confusion as to just how NIMD 2004 will be used; by who; and for what. The Council has previously been severely disappointed for example as to the extent to which NIMD 2001 (“Noble”) has evidently been ignored by central government when it makes major investment and/or policy decisions.

5.2 Finally, the Council welcomes the opportunity to make this submission on the consultation document. It also believes there is a need for ongoing local authority-based scrutiny of NIMD as it is rolled out in the future and would welcome discussing with NISRA how this might best be achieved.

D McSorley  
Chief Executive

28 October 2004

