



## **Response to consultation on Northern Ireland Multiple Deprivation Measure 2009**

**Our reference: Cons - 1058**

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

## **1.0 Background to NICVA**

- 1.1 NICVA (the Northern Ireland Council for Voluntary Action) is the umbrella body for the voluntary and community sector in Northern Ireland. It provides over 1,000 members with information, advice, training and support services on a wide range of issues, together with representation for the sector as a whole.
- 1.2 NICVA works to achieve progressive social change, based on equality and equity, working through a community development approach, to empower local communities to pursue their own needs and agendas.

## **Comments**

### **2.0 General comments**

- 2.1 NICVA welcomes the opportunity to comment on the updating of the NI Multiple Deprivation Measure. We appreciate that this is not a full review of the Measure and that this will be best done when we have new census data and new administrative boundaries are in place post-2011. NICVA has worked with NISRA over the past ten years on development and reviews of the Measures and we think it is now timely that, as proposed, we take cognisance of changes to benefits and access to new data which can be utilised within the existing measures structure in the interim. As part of the steering group which has worked on the update, we have fed in views as the process has progressed. These additional views in writing take account of our previous work and of the views of member organisations expressed in consultation.
- 2.2 NICVA understands that The Noble team from the University of Oxford 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.
- 2.3 NICVA is particularly disappointed that the NI Multiple Deprivation Measure (NIMDM) can, since 2007, no longer benefit from 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, to the detriment of the overall Measure. The DSD Minister or, if necessary, the NI Executive as a whole, should liaise with HMRC to secure the future inclusion of this important information which, after all,

is only being passed from one part of government to another and should still remain confidential, if government's own procedures are followed correctly. Northern Ireland is clearly suffering from a restriction of data circulation due to a number of unfortunate incidents in England where data security was found wanting. This should not be allowed to prevent us from being able to measure deprivation in Northern Ireland as accurately as we can, in order to inform policy.

- 2.4 The unsuitability of data from the Family Resource Survey (FRS) and the Labour Force Survey (LFS) for use in NIMDM arises several times in the course of the consultation document. NICVA recognises the importance of these surveys and also the considerable expense they entail. However, it is unfortunate that they cannot be utilised in the NI Multiple Deprivation Measure due to the sample size in Northern Ireland, even with boosted samples. For the development of the next set of deprivation measures, NICVA would urge consideration of how these surveys could be further boosted to make them amenable to use at small area level and thus for inclusion in a future MDM.

### **3.0 Income Deprivation Domain**

- 3.1 Since the income deprivation domain relies so heavily on benefits data, benefit uptake rates are obviously of crucial importance, as recognised in the recommendations of the NIMDM 2005 report. It is unfortunate that, as the only possible source of this information, the Family Resource Survey (FRS) does not have a sufficiently large sample size in Northern Ireland to provide robust data, as mentioned above.
- 3.2 It is also a pity that the work commissioned by NISRA on small area income deprivation estimates for Northern Ireland cannot be incorporated into the income domain, due to reliance on Census 2001 and FRS data. NICVA would welcome the inclusion of this kind of information in the next version of the NIMDM. Recent research published by the Joseph Rowntree Foundation has highlighted the issue of low income households in work but not receiving benefits in Northern Ireland. In addition to this migrants from A8 countries, who are unable to claim benefits in their first year of residence, will not be picked up in the domain.
- 3.3 Likewise, NICVA would welcome the inclusion of a child-specific multiple deprivation measure, as per the recommendation in the 2005 report. Given the levels of child poverty in Northern Ireland and the current political focus on child poverty-related issues, including legislation, we are mystified as to why OFMDFM has recommended that there be no child specific MDM at this point. We are in full agreement that it should certainly be included in the next full NIMDM.
- 3.4 NICVA supports the inclusion in the updated domain of indicators relating to Income Support, State Pension Credit and the income

component of Employment and Support Allowance to reflect changes in the benefits system relating to criteria for claiming Income Support.

- 3.5 We also agree with the proposal to include adults and children living in Housing Benefit households to capture those who are renting and have incomes below a minimum level, but who are not already claiming a range of other benefits. However, people on low incomes in receipt of tax credits (which count as income) may not actually qualify for Housing Benefit. Without HMRC data to indicate this there is a danger that these people may not be counted at all and therefore not represented in the indicator. As mentioned above, re-securing HMRC data should be a priority for NI Ministers. NICVA welcomes the fact that NISRA are seeking to include data on both rent and rates elements of Housing Benefit, as it would be beneficial to have both within the indicator.

#### **4.0 Employment Deprivation Domain**

- 4.1 Following recommendations from the 2005 report that Labour Force Survey and Family Resources Survey be used as possible sources of information on hidden unemployment, NICVA is again disappointed that sample sizes are too small to use in the NIMDM. As noted above, we would request further exploration of how these surveys might be incorporated into the next Measure and what changes might be required to facilitate this.
- 4.2 We note that information from the New Deal, which has been replaced by Steps to Work, will no longer be included. However it is a pity that this cannot be replaced with Steps to Work data since the programme does not operate right across Northern Ireland.
- 4.3 NICVA welcomes the inclusion of those claiming the new Employment and Support Allowance alongside those claiming Incapacity Benefit.

#### **5.0 Health Deprivation and Disability Domain**

- 5.1 In this domain NICVA welcomes the work that has been done since 2005 on emergency admission rates. Questions had been raised about whether there was a rural bias in this indicator since distances to accident and emergency services would be greater in rural areas. The subsequent investigation, which has revealed that using a minimum four day stay in hospital, post emergency admission, would remove any possible bias means that the indicator is now more robust.
- 5.2 NICVA also welcomes the inclusion of mental health admissions alongside mood and anxiety prescription information and suicide rates. However, we would note that hospital stays for mental health conditions may reflect availability of services more than actual need

and thus actual health deprivation. We do, though, note that a perfect proxy indicator is not always available. NICVA notes and welcomes the improvement in the prescribing data on mood and anxiety disorders, which now includes accurate patient location information.

- 5.3 NICVA welcomes the proposed inclusion of a dental health indicator for under 16s. As mentioned above, it is unfortunate that this, and other information, will not be compiled into a children's Multiple Deprivation Measure at this time.
- 5.4 The proposed inclusion of a low birth weight indicator will also strengthen this domain.
- 5.5 There are still persistent large information gaps in Northern Ireland relating to conditions affecting small proportions of the population, such as learning disability, which means they are continually excluded from measure such as NIMDM. For future measures, ways should be explored to remedy this.

## **6.0 Education, Skills and Training Deprivation Domain**

- 6.1 NICVA welcomes the extension of performance data to primary schools, as per the recommendation in the 2005 report, rather than using the proxy indicator of proportions of years 11 and 12 pupils not in grammar schools. We agree that this change introduces a more accurate measure of primary school attainment levels, thanks to changes in collection of primary level assessment data.
- 6.2 In addition we welcome the extension of absenteeism and Special Education Needs data to primary school level. Since the Department of Education is currently consulting on Special Education Needs proposals, which include the removal of statementing, it is clear that this could have a substantial impact on future Measures of Multiple Deprivation.
- 6.3 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.
- 6.4 The 2005 report recommended consideration of alternatives to census 2001 data (now over eight years old) for calculating education, training and skills deprivation in working age adults. NICVA notes that consideration has been given to using the Labour Force Survey to calculate adults with no qualifications, but, yet again, the sample size prevents this.
- 6.5 NICVA agrees with the proposal to form three sub-domains within this domain reflecting deprivation amongst primary age pupils, post primary

age pupils and working age adults. We agree that the equal weighting for the three sub-domains reduces reliance on out-of-date census data for working age adults.

## **7.0 Proximity to Services Deprivation Domain**

- 7.1 NICVA would preface its remarks to this section by stating that guidance on use of this domain must make clear that proximity to services does not equal access. People in deprived areas may be prevented by price, sectarian chill factors or cultural habits from accessing services such as shops, further education centres, leisure facilities or healthcare centres which would appear to be on their doorsteps.
- 7.2 We note that the recommendation from the 2005 report that Translink information on proximity to public transport be included has not been possible due to the fact that Translink does not have an integrated system to record this data. Immediate steps should be taken by Translinks's sponsoring Department, DRD, to remedy this in time for the next review of the NIMDM as information on frequency and timing of transport is extremely important in considering proximity to services. We note that the available car ownership data is rendered unusable without the corresponding public transport data.
- 7.3 NICVA welcomes the inclusion, as recommended, 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, regardless of which side of the border it is on.
- 7.4 We agree with the combination of opticians, dentists and pharmacies into a single indicator as they are important services, but 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.
- 7.5 We agree that expansion of the food shop indicator to include food retailers which are not large enough to have been classed as supermarkets in the previous indicator will give a clearer picture of proximity. However, as noted above, this does not mean the same thing as access. Smaller shops may well have higher prices, not having the purchasing power of larger supermarkets, and so people on low incomes may still have to travel large distances, if they have access to transport, to purchase food at lower prices from a larger shop.
- 7.6 NICVA agrees that population size is not an adequate proxy for service provision and welcomes the inclusion of the newly available data on service centres in smaller settlements.

- 7.7 The proposal that travel times, rather than distances, will be used to measure proximity is an important change. 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.
- 7.8 We note that broadband speed data was not available for all areas of Northern Ireland and hope that this can be included in the next review of the Measure.

## **8.0 Living Environment Domain**

- 8.1 NICVA notes the introduction of the Decent Home Standard since the last NIMDM was developed. Since this measures thermal comfort, we agree that the indicator relating to central heating, which relies on out-of-date census data, be removed and that the Housing Quality sub-domain should therefore consist of Decent Home Standard data along with Housing Health and Safety Rating data.
- 8.2 We agree that the small numbers not connected to mains water mean this indicator would not be an accurate reflection of housing quality across Northern Ireland and should not be introduced.
- 8.3 We accept the argument that introduction of a separate fuel poverty indicator would duplicate information already contained in the Income domain and the Living Environment Domain.
- 8.4 It is unfortunate that the data on household overcrowding are only available from the 2001 census and are therefore too out of date to be used for this purpose now, considering the considerable migration into Northern Ireland and the fact that living conditions of these households would not be recorded. NICVA would like to see the household overcrowding indicator reinstated in the next NIMDM when new data are available.
- 8.5 NICVA notes that consideration has been given to the quality of geographical coding of homelessness data and that this has been partially improved. People may well present as homeless in a large urban centre such as Belfast, but this may be unconnected to their last place of residence and will thus present a skewed picture of housing need and where homelessness is occurring. Whilst the Housing Executive has not been able yet to identify discrepancies between last place of residence and place where a person presents as homeless, due to lack of research, we note that an improvement has been made in isolating communal establishments such as shelters and hostels so that a bias does not appear in certain areas.
- 8.6 We also note that road quality was considered for inclusion in this domain but DRD information was not appropriate for this purpose. As

the responsibility for local roads will have passed to local authorities by the time the MDM is next reviewed, NICVA would hope that this information will become available for inclusion next time.

## **9.0 Crime and Disorder Domain**

- 9.1 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. NICVA notes that this has not been possible due to the sample sizes concerned. Since these surveys are taking place and receiving resources anyway NICVA would recommend consideration of what extra resources and sampling would be necessary to make the information utilisable in the next NIMDM.
- 9.2 Likewise, it would be useful if planned NIO research in the interim is able to make available information on the relationship between crime reporting rates and deprivation for future NIMDMs.
- 9.3 We recognise that under reporting of domestic violence is problematic and agree that PSNI recorded crime data should continue to be used, since consideration has been given to reporting rates to other voluntary and statutory agencies, but this has proven to be much lower than PSNI rates.
- 9.4 We welcome the inclusion of five years of data, rather than three, in each of the indicators in the crime sub-domain, to decrease the impact of uncharacteristic events.

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