

# Response to Comments on NIMDM 2017 Consultation

## 1 INTRODUCTION

- 1.1 A [consultation](#) was launched on 21 November 2016, which set out the proposals for the updated Multiple Deprivation Measure (NIMDM 2017). In total, 28 responses were received from a variety of organisations.
- 1.2 This document contains extracts of the comments made by organisations and individuals, along with the response from the Deprivation Team, which was compiled in conjunction with the seven domain expert groups supporting the work and signed-off by the Steering Group. Where these comments were raised by several respondents or resulted in changes to the proposals, they have been reported and addressed in the accompanying Blueprint Document.

## 2 SCOPE OF THE 2017 UPDATE

- 2.1 As outlined in the consultation document, NISRA was commissioned by SCG to undertake an update of the current Northern Ireland Multiple Deprivation Measure (NIMDM 2010), with the aim of releasing the NIMDM 2017 results later in the year. Any significant revisions to the methodology are outside of the scope of this update.
- 2.2 While the seven domains that were used in 2010 will remain, the update has considered the appropriateness (or otherwise) of the current indicators that were incorporated within these domains and the datasets upon which they are based. Indicators must conform to the criteria outlined below and will only be revised where there is a strong rationale (and supporting data) to support the revision.

### 3 CRITERIA FOR INDICATORS

3.1 Each of the seven domains (i.e. Income, Employment, Health & disability, Education, skills & training, Access to services, Living environment and Crime & disorder) consists of one or more indicators that are considered to encapsulate that particular type of deprivation. In order to be considered for inclusion, each indicator should conform to the following six criteria:

- a) It should be specific to one of the seven domains of deprivation thus avoiding double counting and attaching undue weight to any particular indicator.
- b) It should represent major features of that form of deprivation rather than deprivation affecting a small number of people or particular types of area in Northern Ireland. This allows the degree of deprivation to be identified as opposed to a simple 'present/ not present' approach.
- c) It should be available for all of Northern Ireland, collected in a consistent form and be free from spatially bias characteristics.
- d) It should represent either a direct measure or a good proxy of that form of deprivation.
- e) It should be statistically robust at the small area level, facilitating the identification of 'pockets' of deprivation.
- f) It should be as up to date as possible.

3.2 These criteria – unchanged from NIMDM 2010 – were highlighted in the consultation document and have been used by the deprivation team and the domain expert groups to assess the suitability of the proposed indicators and additional indicators suggested through the consultation.

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# Income Deprivation Domain

Comments by Organisation	Response from Deprivation Team
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<p><b>Mid Ulster Council</b>  <i>It would be useful to have a figure for the equivalised income at the 60% of the NI median and contrast this with an average figure to have something tangible to reflect on.</i></p> <p><b>Armagh, Banbridge &amp; Craigavon Council</b>  <i>Clarification is required in relation to the sources of income that would be covered in any new household income indicator.</i></p> <p><b>Derry City and Strabane District Council</b>  <i>Until further details are provided on this measure the Council cannot provide an indication on its appropriateness</i></p> <p><b>Anonymous</b>  <i>I am troubled by the brevity of the proposal.</i></p> <p><b>Derry City and Strabane District Council</b>  <i>Will [the median income] be based on the median income derived from a Department of Communities administrative database or from a survey, e.g. Family Resources Survey.</i></p> <p><b>Fermanagh and Omagh District Council</b>  <i>... disappointed and concerned that ... the new indicator under the Income Domain ... caveated as 'if the data are available'.</i></p> <p><i>It would be a failure on behalf of the Domain Expert Group's response to the recommendation from NIMDM 2010 to not develop the proposed indicator.</i></p>	<p>The Deprivation Team can confirm that the income domain indicator that was proposed in the consultation document will be developed. It will be derived from the Department for Communities database for income modelling and estimation, known as the DIME, and not from the Family Resources Survey.</p> <p>The following sources of income will be included:</p> <ul style="list-style-type: none"> <li>- employment;</li> <li>- self-assessment;</li> <li>- work-related pension schemes;</li> <li>- interest on savings;</li> <li>- social security benefits; and</li> <li>- Tax credits.</li> </ul> <p>While acknowledging that it would have been useful to have had access to the actual figures that will be deployed, they are not currently available and will be produced when the underlying data have been secured, processed and analysed.</p>
<p><b>Roslea Community Association</b>  <i>Fermanagh workers have the lowest income in NI. Allowance should be made for this.</i></p>	<p>The income deprivation indicator will aim to identify the proportion of the population in specific geographical areas (e.g. SOAs) who are living in households whose equivalised income is below 60 per cent of the NI median. The areas will then be ranked accordingly, thus addressing this concern.</p>

## Income Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Consumer Council</b> <i>Could 'Number of homes in fuel poverty' please be added to the NISRA statistics on deprivation?</i></p>	<p>Fuel poverty is associated with two components, namely income and fuel costs. The latter could be driven by energy efficiency measures, which are captured in the Living Environment Domain. As such, it fails criterion a (<i>i.e. the need to be domain specific</i>).</p>
<p><b>CCEA</b> <i>The Income domain may also benefit from a housing cost or affordability indicator as another measure of marking deprivation.</i></p> <p><b>Derry City and Strabane District Council</b> <i>How will the proposed indicator factor in the cost of housing related to tenure</i></p> <p><b>NI Local Government Association</b> <i>... suggests that the income domain may also benefit from a housing-cost or housing affordability indicator.</i></p>	<p>As highlighted in the Blueprint document, this will not be possible in this update. Household costs/ affordability indicators of this nature, which accord with the agreed deprivation indicator criteria, are not currently available at a low enough geographical level to support the current deprivation update.</p>
<p><b>Consumer Council</b> <i>Please can NISRA consider how ... information [on self-disconnection from energy supply] could be collected?</i></p> <p><b>Rural Community Network</b> <i>Household deprivation is the result of the interaction between household income and household costs and if NISRA can't quantify one side of this interaction our understanding of income deprivation is limited.</i></p> <p><b>Belfast City Council</b> <i>The council would suggest that [taking a threshold as simply a percentage of median or mean income ] does not take account of the level of income required to meet certain levels of need, for example to meet necessary living standards.</i></p> <p><b>Age NI</b> <i>We would like to request further information as to the issue of investigating needs based approaches</i></p>	<p>The Blueprint document touches on aspects such as these.</p> <p>It highlights that household cost information, which accords with the agreed deprivation indicator criteria, is unfortunately not currently available at a low enough geographical level to support the deprivation work. This is also the case for self-disconnections.</p> <p>In terms of need, this is indirectly captured to a degree through the equalisation of household income, where larger households require a higher income to enjoy the same living standard.</p>

## Income Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Mid Ulster Council</b>  <i>It would be good to benchmark this with similar research data from Save the Children and Barnardos charities.</i></p>	<p>The final report on the NIMDM 2017 will be accompanied by methodology and quality papers. The latter will include benchmark statistics where appropriate.</p>
<p><b>Equality Commission</b>  <i>We recommend that the Income Deprivation Domain should clarify how any potential for errors arising from Households of Multiple Occupancy will be addressed.</i></p> <p><b>Belfast City Council</b>  <i>The council would seek clarification on how the indicator would reflect houses of multiple occupancy where there is a disparity in the income of the occupants.</i></p>	<p>The deprivation team, in conjunction with the Department for Communities, will endeavour, where possible, to identify Households of Multiple Occupancy and explore methods to adequately reflect the income of its occupants. This aspect will be clarified, as suggested, in the supporting documentation to be released with the results.</p>
<p><b>Belfast City Council</b>  <i>We would be keen to see supporting information also produced in respect of income deprivation affecting people living with a disability (and the sub-sets of children and older people within that).</i></p>	<p>As highlighted in the Blueprint document, supporting information will be produced in respect of income deprivation affecting children (i.e. those aged 15 and under) and older people (i.e. those aged 65 and over) showing:</p> <ul style="list-style-type: none"> <li>• the proportion of the population aged 15 and under living in the households identified above; and</li> <li>• the proportion of the population aged 65 and over living in the households identified above.</li> </ul> <p>The feasibility of producing the additional supporting information suggested, in respect of people living with a disability, will be considered. Users will be kept apprised of any developments and associated timings.</p>
<p><b>Belfast City Council</b>  <i>[We] would request further consultation on the finished measure.</i></p>	<p>No further consultation on the selected indicators or the finished measure is planned as this would significantly delay the publication of the updated measures. Dissemination events will however be held after the final report is published and the results will be accompanied by user guidance and methodology/quality papers.</p>

## Income Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Anonymous</b>  <i>Any multiple deprivation measure which ignores wealth inequality has a serious flaw; but I do not have sufficient knowledge of available data sources to suggest a robust wealth domain measure.</i></p>	<p>The domain expert group was unable to identify suitable data sources. Wealth can contribute to income, for example, through returns on investment or savings.</p>
<p><b>Donagh Development Association</b>  <i>I would ask that NISRA also obtain from HMRC details of number of working parents with young children who do not claim the childcare element as I believe this would be a high proportion in rural areas ... where it is almost impossible to access registered childcare - as a result many working couples have to rely on family or others to look after their children and are unable to benefit from the childcare element.</i></p> <p><b>Naíscoil an Traonaigh</b>  <i>We believe that NISRA should also collect information in relation to numbers of working parents with young children who are not claiming the Child care element of Working Tax Credits for the simple reason that there are no registered childcare services available in their area which means they are paying more for their childcare as they can't avail of the credits resulting in their actual income being reduced.</i></p>	<p>The childcare element of working tax credit is treated as a source of income. Households not claiming it will exhibit lower household incomes, which will be reflected in the planned indicator.</p> <p>Having considered the responses to the consultation, proximity to crèches and day nurseries will now be included in the Access to Services Domain.</p>
<p><b>Derry City and Strabane District Council</b>  <i>more information ... on the proposed impact of the implementation of Universal Credit and how it is envisaged Universal Credit will be brought into the scoring and measurement of deprivation, especially within the Income Domain.</i></p>	<p>Universal Credit is not due to be introduced in Northern Ireland until September 2017 and so it will have no impact on the current update of the deprivation measures.</p> <p>In any future updates Universal credits would be included as an income similar to current benefits as a source of income.</p>

## Income Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Erne East Community Partnership Ltd</b>  <i>Measurement should be made of the number of members of the household would have had to migrate/ emigrate because of economic circumstances</i></p>	<p>This issue is addressed in the Blueprint document as follows.</p> <p><i>'The migration data that are currently available for either movements within Northern Ireland or movements to somewhere outside Northern Ireland do not record either the reason for migrating or the employment status of the migrants before or after their move. As such, it is not possible to quantify the extent to which the lack of employment opportunities in an area motivated those who decided to move. Against this background, and given that including all migration of the (working age) population would result in an over-representation of this phenomenon, the employment domain expert group concluded that migration due to the lack of employment opportunities could not be robustly captured and hence reflected in this domain.'</i></p>
<p><b>Derry City and Strabane District Council</b>  <i>Is there scope to broaden the indicators proposed to measure income deprivation to include issues such as credit scores, debt levels, savings and investments</i></p>	<p>The following is an extract from the NIMDM 2005 blueprint, which still represents the current position:</p> <p><i>'There are a number of reasons why this is difficult and inappropriate. First, consistent sources of information at SOA level across Northern Ireland do not exist. Information on, for example, referrals to Citizen Advice Bureaux (which does exist) would give a skewed picture as it relates only to help seeking behaviours. Similarly County Court judgments give a distorted picture as most cases do not come to court. Second there are many different reasons for debt, some of which do not relate to low income. To take an example, a debt on a credit card might reflect poverty, but might also reflect a judicious spreading of cost of asset acquisition by relatively well off people. The third issue is conceptual. Even if robust information is available we remain unconvinced that it should be included as the domain specifically is an attempt to measure low income, and debt in itself is not a measure of low income.'</i></p>

## Employment Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>St. Peters Immaculata Youth Club</b>  <i>The falls ward also includes part of the city centre and this can skew the statistics.</i></p>	<p>The primary geography for deprivation statistics is Super Output Areas (SOAs), which are the former electoral wards or sub-divisions of those wards. The former Falls ward is made up from three SOAs. Falls_3 SOA does include part of the city centre. However, employment deprivation is measured based on the usual resident population of this area, not the number of people that work in this area.</p>
<p><b>Mid Ulster District Council</b>  <i>Going forward the review would need to have cognizance of extending the working / pensionable age to 67.</i></p>	<p>Under the current timetable<sup>1</sup>, pensionable age will not increase beyond 65 until December 2018. Future deprivation measures will take cognizance of this change, but as 2014/15 data are being used in NIMDM 2017, working age will remain 18 to 64 years.</p>
<p><b>Mid Ulster District Council</b>  <i>Review needs to also take on board NI low levels of labour mobility.</i></p> <p><b>Rural Community Network</b>  <i>We are also concerned that this approach takes no account of the migration of people from rural communities.</i></p> <p><b>Erne East Community Partnership</b>  <i>The need for people to emigrate because of lack of local employment ... need to be incorporated in to NISRA data.</i></p> <p><b>Anonymous MLA</b>  <i>There needs to be consideration given to Immigration figures.</i></p>	<p>These issues are discussed in the Blueprint as follows.</p> <p><i>'The migration data that are currently available for either movements within Northern Ireland or movements to somewhere outside Northern Ireland do not record either the reason for migrating or the employment status of the migrants before or after their move. As such, it is not possible to quantify the extent to which the lack of employment opportunities in an area motivated those who decided to move. Against this background, and given that including all migration of the (working age) population would result in an over-representation of this phenomenon, the employment domain expert group concluded that migration due to the lack of employment opportunities could not be robustly captured and hence reflected in this domain.'</i></p>

<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/310231/spa-timetable.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/310231/spa-timetable.pdf)

## Employment Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>College of Occupational Therapists</b>  <i>We would like to see how Welfare Reform will impact on this measurement.</i></p>	<p>For the current update, data will relate to the 2014/15 financial year, which is before the planned implementation of the (proposed) Welfare Reform. It is expected that future deprivation updates will take cognisance of Welfare Reform.</p>
<p><b>College of Occupational Therapists</b>  <i>For some people they will never be able to work in full time paid employment, however as equal members of society they should have their rights to 'occupation' equally recognised through a measurement.</i></p>	<p>The Employment Domain identifies the proportion of the working age population excluded from work at the small area level. Accordingly those people who may be working fewer hours than they would like, will not be included in the domain.</p> <p>The proposed income domain indicator will however take account of households experiencing lower incomes resulting from household members being unable to work on a full-time basis.</p>
<p><b>College of Occupational Therapists</b>  <i>It is necessary to ensure that all relevant populations are included ... such as people living in care homes, sheltered dwellings or those who may have more complex disabilities.</i></p>	<p>The employment domain looks at individuals rather households. All individuals of working age who are receiving one or more of the listed benefits will be included.</p>
<p><b>Rural Community Network</b>  <i>RCN is concerned that the use of the selected benefits to measure for the employment deprivation domain has the potential to lead to errors due to double-counting and would caution that robust controls need to be in place to eliminate double-counting of claimants.</i></p>	<p>The deprivation team will be working closely with the Department for Communities to develop the indicator in question and will endeavour to mitigate the risk of double counting through the use of appropriate anonymised unique identifiers</p>
<p><b>Belfast City Council</b>  <i>The council would request further investigation as to whether the Census measure of economic activity could be used as an alternative for employment deprivation.</i></p>	<p>The 2011 Census specifically asked about economic activity during the 4 week period prior to Census day (27th March 2011) and, as such, is considered to be affected by seasonality. However, it will be used as a comparator in the quality assurance of the Employment Deprivation Domain.</p>

## Employment Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>CCEA</b> <i>It is unclear whether [suitable information on the spatial distribution/ prevalence of hidden unemployment] will be available.</i></p> <p><b>Naíscoil an Traonaigh</b> <i>Content that Hidden Employment included though would worry that info, MAY be available.</i></p> <p><b>Anonymous MLA</b> <i>Hidden Employment welcome inclusion but needs to be quantified - discontent that this only may be the case.</i></p> <p><b>Fermanagh Rural Community Network</b> <i>FRCN would have some concern that it is not yet guaranteed.</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>... disappointed and concerned that ... inclusion of hidden employment ... caveated as 'if the data are available'.</i></p>	<p>The Blueprint document seeks to address these points.</p> <p>It is the intention of the Deprivation Team, with the support of colleagues in the Department for Communities, to take account of hidden unemployment in the update. Users will be kept apprised of developments on this front when the necessary data have been captured, processed and analysed. If robust data that meet the criteria are available, the information will be included.</p>
<p><b>Belfast City Council</b> <i>The council would request further information on the measurement of the proposed indicator, specifically whether the proportion of the working age population in receipt of benefits is a yearly average figure.</i></p>	<p>This indicator is defined as the number of people in receipt of at least one of the listed benefits, during the period April 2014 and March 15, as a proportion of the total population. A yearly average will be based on monthly data to account for seasonality.</p>
<p><b>Derry City and Strabane District Council</b> <i>How will individuals who are not in employment but not registered as unemployed be captured within the proposed domain?</i></p>	<p>People who do not have an income from employment and are not in receipt of any income related benefits will be included in the 'hidden unemployment indicator'. The DIME will capture these people and their characteristics if they or someone else in their household have received income from employment, benefits or tax credits, or are self-assessed.</p>
<p><b>Age NI</b> <i>... should include the employment rates of older people aged 65 years and older and the proportion of older people aged 65 and older who wish to work and have no qualifications or qualifications below Level 2.</i></p>	<p>The domain expert group was not aware of a data source that would provide this information, in accordance with the agreed criteria, at a low enough geographical level to support the current deprivation update.</p>

# Employment Deprivation Domain

## Comments by Organisation

## Response from Deprivation Team

### **Belfast City Council**

*the council is aware that the indicator does not reflect or fails to identify those in low paid jobs, under-employment or the typical wave pattern of churning between jobs and unemployment.*

### **Derry City and Strabane District Council**

*On the issue of 'underemployment' has consideration been given to those on 'zero hour' contracts or those who would like to but are unable to work extra hours?*

### **Anonymous**

*it would be worth thinking about people who are employed in 'bad' jobs, maybe zero hours contracts; people who are involuntarily and partially 'self-employed', or involuntarily 'economically inactive'.*

### **NI Rural Development Council**

*The use of benefit uptake does not take account of ... underemployment.*

*The relevance of uptake of the listed benefits may also present a misleading picture ... a lack of job opportunities within an area which would appear to be a more suitable definition.*

Issues of this nature are touched on in the Blueprint document as follows.

*'The importance of these labour market dynamics has been recognised in the context of the draft Programme for Government and while work has been initiated on the development of an appropriate population based 'better job' indicator, it is currently not clear when the information might be available and at what geographical level (for the Deprivation work, ideally the information would have to be available at the Small area and Super Output Area levels). In the absence of this, the employment domain expert group were unable to identify any appropriate information source that would enable the measurement of such employment experiences at a low enough geographical level to support the current deprivation update. '*

## Health Deprivation and Disability Domain

Comments by Organisation	Response from Deprivation Team
<p><b>College of Occupational Therapists</b>  <i>Quality of life is more than this such as well being, satisfaction with life and other measurements which do not seem to have been considered in this at all.</i></p>	<p>The domain expert group acknowledged this point, noting that measures of this nature are typically collected through surveys. However, the sample sizes of such surveys are not sufficient to enable an appropriate indicator to be developed at a low enough geographical level to support the deprivation work.</p>
<p><b>College of Occupational Therapists</b>  <i>It is not clear why cancer is singled out as one particular condition/illness.</i></p>	<p>Cancer continues to be the leading cause of death in Northern Ireland, accounting for 28% of all deaths registered in 2015. From a deprivation perspective, cancer was first included in the 2001 deprivation measure, based on the availability and quality of data on a serious illness. It was proposed to be dropped in the consultation for the NIMDM 2005, but reinstated following consultation responses. One key argument for retaining it is that, although in part captured through mortality and health benefit data, commonly used treatments such as radiotherapy and chemotherapy would not be picked up in the prescription data.</p>
<p><b>Roslea Community Association</b>  <i>Closure of many single doctor health centres especially in Fermanagh needs to be recognised.</i></p> <p><b>Erne East Community Partnership</b>  <i>there is no recognition of the negative effect of the consolidation of health and social care services and how this impacts rural communities.</i></p>	<p>The proximity to GPs and other health related services is captured in the Access to Services domain. Any worsening of health at the local level, which may have arisen as a result the consolidation of health and social services and the closure of certain services, will be captured in the Health Deprivation and Disability Domain for this, and any subsequent, update.</p>
<p><b>Rural Community Network</b>  <i>We are unclear why the Potential Years of Life Lost indicator is using years of life lost from age of death to 75 when average male life expectancy in NI is currently 78 and average female life expectancy is 82.</i></p> <p><i>the Years of Potential Life Lost indicator should receive significant weighting when the indicators are combined.</i></p>	<p>On the basis of the responses received to the consultation, the domain expert group reflected on the overlap between the potential years of life lost indicator and the preventable mortality indicator. In view of the risk of double counting, the group opted in favour of the preventable mortality indicator, which is in keeping with the thrust of the draft Programme for Government.</p>

## Health Deprivation and Disability Domain

Comments by Organisation	Response from Deprivation Team
<p><b>CCEA</b> <i>It may be advisable to reduce reliance on the Census, as the data dates relatively quickly.</i></p> <p><b>Belfast City Council</b> <i>the reliance on outdated Census data.</i></p> <p><b>NI Local Government Association</b> <i>NILGA queries the appropriateness of using 2011 Census data given a key criteria for the inclusion of indicators is the need to be 'up to date' as possible.</i></p> <p><b>Newry, Mourne &amp; Down District Council</b> <i>it is of concern that the indicator relating to long term illness and disability relates to data collected as far back as the 2011 census.</i></p> <p><b>Armagh, Banbridge &amp; Craigavon Council</b> <i>proportions of people with long-term health problem or disability from the 2011 Census would enhance the domain.</i></p>	<p>This issue is discussed in the Blueprint document:</p> <p><i>'the domain expert group felt that the 2011 Census data are, in reality, less out of date than perhaps perceived: compared to the other proposed indicators, the information is only four to five years older than the benefit or prescription data, but less so for those indicators that require a longer time period to become sufficiently robust. The group also felt that the currency of the 2011 Census data was considerably offset by its relative strength in terms of its coverage of the whole population and the fact that it may include people who are not captured in the other indicators. In addition, comparing the comparison of age-sex specific proportions of people with a long-term health problem or disability according to the 2011 Census to those reporting limiting long-term illness in the 2001 Census, suggests that the figures are not prone to significant change and, as such, the 2011 figures are likely to be fairly representative.'</i></p>
<p><b>Belfast City Council</b> <i>the council believes that contemporary health problems such as obesity, chronic heart disease and stress should be considered.</i></p>	<p>It is not unfortunately possible to quantify the prevalence of conditions of this nature based on disease-specific prescriptions, Having said that, the domain expert group felt that the health problems in question would already be reflected, to a degree, in the other indicators already included (e.g. health benefits mental health)</p>
<p><b>Erne East Community Partnership</b> <i>consideration might be given to emergency response times</i></p>	<p>This will be indirectly captured if longer response times lead to worse outcomes. It is also expected to be highly correlated to the travel time to A&amp;E in the Access to Services domain.</p>
<p><b>Erne East Community Partnership</b> <i>[Suicide] figures for recent years ... have shown highest statistics for Fermanagh. Apart from inner city Belfast areas Fermanagh stats are consistently high. Is this taken into account?</i></p>	<p>Suicides are included in the combined mental health indicator.</p>

## Health Deprivation and Disability Domain

### Comments by Organisation

### Response from Deprivation Team

<p><b>Donagh Development Association</b> <i>numbers of elderly receiving help in their own homes should be included</i></p> <p><b>Naíscoil an Traonaigh</b> <i>There is no inclusion of care in the community for those with disabilities and feel that this element should be included particularly in relation to the elderly</i></p> <p><b>Anonymous MLA</b> <i>we need to include those in receipt of home care/home help, meals on wheels etc</i></p> <p><b>Fermanagh Rural Community Network</b> <i>FRCN would ask that some thought is given to using data sources to capture levels of older persons ... living on their own and those ... who are having to avail of services such as Domiciliary Care or Meals on Wheels.</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>[propose] the proportion of single person households where the household reference person is aged 75 years or older</i></p> <p><i>the number of people aged 75 years or older receiving state funded domiciliary care and/or 'meals on wheels' services (also state funded), expressed as a proportion of the total over 75 years population.</i></p>	<p>This issue is discussed in the Blueprint document:</p> <p><i>'Whilst the domain expert group recognised both the value and importance of such services, particularly in rural areas, it felt that the delivery of such services captured how current policy is seeking to address health needs in an area rather than providing a direct measurement of poor health or disability. Accordingly, the domain expert concluded that such an indicator fails the criterion of being a direct measure of health deprivation (criterion d) and, as such, should not be included. '</i></p>
<p><b>Derry City and Strabane District Council</b> <i>Would the Mental Health Indicator benefit from including admissions to A&amp;E for self-harm in conjunction with mental health inpatient stays?</i></p>	<p>The treatment for self-harm via A&amp;E units only captures part of the picture as those who attend Minor Injury clinics/ GP/ Out of Hours Services will not be included. In view of the geographical differences in the variety, use and availability of services to deal with self-harm patients, the domain expert group felt that it wasn't feasible to develop an appropriate indicator that would meet the agreed deprivation criteria. More specifically, the group had concerns that such an indicator would exhibit a large urban bias due to the location of A&amp;E departments (e.g. in Belfast and Derry).</p>

## Health Deprivation and Disability Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Derry City and Strabane District Council</b> <i>Will the indicator for singleton birth with low birth weight be reliable/robust at small area level even if using averages over a time period?</i></p>	<p>Because of the relatively small numbers involved, five years of data will be used to create an indicator on low birth weight. The deprivation team in conjunction with the data supplier will assess and report on the quality of this indicator.</p>
<p><b>Derry City and Strabane District Council</b> <i>In the case of standardised drug or alcohol related deaths the numbers are likely to be relatively low at the small area level. Given the known delays in findings by the coroner in many cases is this likely to result in 'clustering' within certain time periods even where multiple years are used?</i></p>	<p>Having considered the responses to the consultation, the expert group decided to exclude the Drug and Alcohol Deaths indicator on the grounds of (i) the very small numbers of such cases and (ii) the fact that they will be reflected in the Preventable Deaths indicator.</p>
<p><b>Derry City and Strabane District Council</b> <i>Is there a risk of repeated episodes [of prescribed medication] being missed if each one does not last the required length of the 'prolonged period' but may occur on a number of instances over the course of any given period?</i></p>	<p>The aim of the indicator is to capture severity of illnesses. On the basis of professional pharmacy advice, it will be defined as 'people receiving 5 or more prescriptions in 3 out of 4 quarters including the first at last.'</p>
<p><b>NI Rural Development Council</b> <i>further thought should be given to the identified urban - rural bias in short term emergency hospital admissions and the reasons for the identified shift from a rural to urban bias on this measure.</i></p>	<p>In 2010 there was a small but significant distance to Accident and Emergency hospital effect (i.e. people from rural areas who presented with the same condition were more likely to be admitted than those from urban areas).</p> <p>However, the direction of the bias seems to have switched, with people from urban areas now appearing to have higher admission rates than those from rural areas.</p> <p>In keeping with the NIMDM 2010 work, the potential for bias will be removed by continuing to base the indicator on emergency admissions with length of stay of four nights or more.</p>
<p><b>Age NI</b> <i>recommends that the data is disaggregated for age, to ensure that the experiences of older people are gathered, analysed and informs policy.</i></p>	<p>As noted throughout the Blueprint document, the relevant indicator data will be age standardised where appropriate.</p>

## Health Deprivation and Disability Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Age NI</b>  <i>We believe that healthy life expectancy should be reflected at age 65 and age 85 years as well as birth.</i></p>	<p>Instead of healthy life expectancy, standardised preventable death rate is selected as an indicator of health deprivation, as it is a better measure of premature death. A death is preventable if, in the light of understanding of the determinants of health at the time of death, all or most deaths from that cause (subject to age limits if appropriate) could be avoided by public health interventions in the broadest sense.</p> <p>Life expectancy at higher ages can be skewed by the presence of nursing or residential care homes, which has a high concentration of older people in poor health.</p>
<p><b>Age NI</b>  <i>We therefore recommend that people who reside in care homes should not be excluded from prescription data indicator</i></p>	<p>Not every geographical region will have care home provision –this is particularly the case in terms of the provision of specialised care. As such, people may move out of their area of usual residence to avail of a care home suitable for their needs. Others may elect to move into a particular care home as it is, for example, the care home of their choice or is closer to their loved ones. Against this background, the domain expert group recommended that care homes should be excluded on the ground that they are likely to skew the prescription indicator data for the area in which the care home is located.</p>
<p><b>Age NI</b>  <i>The health impacts of caring are well known, with increased levels of stress, anxiety and social isolation linked to caring tasks and responsibilities, inadequate levels of alternative support and care, complex processes and lack of clarity around accessing the health and social care system.</i></p>	<p>This was acknowledged by the domain expert group which noted that some of these aspects were already being captured to a degree through, for example, (i) those in receipt of a carers allowance in the employment domain, (ii) those in receipt of a mental health related benefit in the health domain and (iii) those in receipt of prescriptions for mood or anxiety related disorders in the health domain.</p>

## Health Deprivation and Disability Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Anonymous</b>  <i>Rather than the proposed long list of indicators, I'd limit it to PYLL, the standardised indicator on chronic illhealth/disability, and the Mental Health indicator, dropping the rest. This includes dropping the emergency admission indicator, which is as much about the performance of the HSC as underlying needs</i></p>	<p>The domain expert group reviewed the complete list of proposed indicators in light of the various responses to the consultation. It was subsequently recommended that the 'Potential Years of Life lost' and 'Drug and Alcohol Related Deaths' indicators were removed for the reasons outlined in both the Blueprint document and other sections of this document. There was very strong support for the inclusion of the other indicators.</p>
<p><b>Newry Mourne and Down District Council</b>  <i>In relation to the indicator on Child dental extractions, it is thought that a more relevant indicator should be the level of registration with a dentist.</i></p>	<p>This issue was addressed in the NIMDM 2010 blueprint:</p> <p><i>'Dental registrations indicator would be an imperfect measure as it does not necessarily equate to poor oral health and may also be intertwined with access issues. Extractions are thought a more appropriate indicator of dental health as it measures an outcome of severe dental disease rather than a contributory factor, such as a low number of visits to a dentist.'</i></p>

## Education, Skills and Training Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>St. Peters Immaculata Youth Club</b>  <i>Should formal education data be separate from the training and skills data?</i></p>	<p>Training and skills are explicitly mentioned in 'Proportions of those leaving school aged 16, 17 and 18 and not entering Further Education, Employment or Training'. The updated Domain will no longer consist of three sub-domains (primary, post-primary and working age adults), thus a less strict separation of formal education, training and skills.</p>
<p><b>College of Occupational Therapists</b>  <i>We would like to see something more reflective of what we feel it is important to achieve at school. This could be coping skills or life skills.</i></p> <p><i>Literacy levels as a basic should be included as an indicator.</i></p>	<p>The deprivation team and domain expert group were not aware of any available low level geographical information on either attendance or qualifications in coping skills or life skills. As such, an appropriate indicator could not be developed.</p> <p>Literacy levels are part of the Key Stage data, which are unavailable due to industrial action. Data about literacy level are also collected via international studies of primary and post primary pupils, but data from these surveys are not suitable for small area analysis.</p>
<p><b>CCEA</b>  <i>Removal of the indicators relating to Key Stage 2 and 3 attainment ... may leave a data deficit in the primary school sub-domain.</i></p> <p><b>NI Rural Development Council</b>  <i>We would recommend that [the lack of Key Stage data availability] be further reviewed at an appropriate time when the required data becomes available.</i></p> <p><b>Derry City and Strabane District Council</b>  <i>Whilst we understand that it has been difficult to collate the 'Key Stage' data ... we believe that [this] Domain is heavily skewed towards post-primary measures.</i></p>	<p>This issue is addressed in the Blueprint Document.</p> <p><i>'This disappointment is of course shared by the domain expert group, who concluded that the levels of coverage of such data were insufficient to support the robust small area analyses required for NIMDM 2017'</i></p>

# Education, Skills and Training Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Roslea Community Association</b> <i>Lack of pre-school and crèches in rural areas need to be recognised.</i></p> <p><b>Erne East Community Partnership</b> <i>Feel that efforts should be made to keep rural primary schools with reasonable numbers open in isolated communities.</i></p>	<p>This is captured in the Access to Services domain. This will be indirectly captured if lack of access has a direct impact on attainment or absenteeism.</p>
<p><b>Rural Community Network</b> <i>It is also concerning that no robust data exists to provide a reliable indicator of adult literacy and numeracy.</i></p> <p><b>Rural Community Network</b> <i>We believe that the working age adults sub domain should receive a higher weighting.</i></p> <p><b>Newry, Mourne &amp; Down District Council</b> <i>education among working age adults relates to data collected as far back as the 2011 census.</i></p>	<p>The deprivation team and domain expert group were not aware of a robust alternative to the Census. Survey data from the OECD are not suitable for small area analysis.</p> <p>The Census data are less out of date than perceived, especially when compared with other indicators that rely on a number of years of data to be robust.</p> <p>Weights for working age indicators in Scotland (0.29), and Wales (0.16) – derived through factor analysis – are lower than the 0.33 proposed for NIMDM 2017. In contrast, the English working age indicator – which captures qualifications and English language proficiency – received half the weight. Having considered the available evidence, the domain expert group concluded that there was insufficient evidence to depart from the weight assigned to the working age adult indicator in NIMDM 2010.</p>
<p><b>Rural Community Network</b> <i>Working age adults sub domain should also contain an indicator which measures the proportion of adults of working age with 3rd level qualifications.</i></p>	<p>Deprivation is concerned with not meeting minimum standards; 3<sup>rd</sup> level qualifications are considered to be well above minimum standards and could be seen to reflect affluence rather than the lack of deprivation). For this reason, 3<sup>rd</sup> level qualifications are not included as an indicator.</p>

## Education, Skills and Training Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Equality Commission</b>  <i>By excluding children at SEN 1-2, the NIMDM 2017 indicators of education deprivation do not provide a measure of educational outcomes for children experiencing delays at all stages of the SEN assessment and statementing process.</i></p> <p><b>NI Rural Development Council</b>  <i>We would suggest further consideration and/or explanation is provided in relation to the inclusion of Special Educational Needs (SEN) indicator and how this contributes towards the Domain.</i></p> <p><b>Newry, Mourne &amp; Down District Council</b>  <i>it is unclear why this should be used as a measure of deprivation given that there are many reasons including medical and clinical conditions which may result in a child having special educational needs.</i></p>	<p>This issue is addressed in the Blueprint Document.</p> <p><i>‘SEN stages 1-2 relate to pupils whose needs are determined within the school without any external specialist assessment/ support. As a consequence, inconsistencies can arise across schools (as evidenced by the relatively weak correlation across schools between the proportion of pupils at SEN stages 1-2) thus skewing the results. As SEN stages 3-5 require an external specialist assessment, there is less likelihood of such inconsistencies arising across schools. In addition, such assessments relate to greater special educational needs, which arguably have a stronger link/ association with deprivation.’</i></p>
<p><b>Equality Commission</b>  <i>NIMDM 2017 did not consider children and young people entitled to Free School Meals (FSM), a proxy measure for economic disadvantage.</i></p>	<p>Free School Meals are directly linked to particular benefits provided to meritorious parents/guardians. As such, the domain expert group felt that it was more closely related to income deprivation than education deprivation.</p>
<p><b>Age NI</b>  <i>Age NI recommends actions which address the barriers faced by older people ... This includes ... a clear commitment to lifelong learning, targeted training initiatives to maintain or gain new skills and qualifications</i></p>	<p>The deprivation team and the domain expert group were unable to identify suitably robust information of the nature suggested, at the small area level, which meets the agreed indicator criteria.</p>
<p><b>Age NI</b>  <i>Age NI believes that data used to measure impact and progress on achieving this domain should include ... the proportion of older people aged 65 and older who wish to work and have no qualifications or qualifications below Level 2.</i></p>	<p>The deprivation team and the domain expert group were unable to identify suitably robust information of the nature suggested, at the small area level, which meets the agreed indicator criteria.</p>

# Education, Skills and Training Deprivation Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Equality Commission</b> <i>We recommend that NISRA develop indicators in relation to early years.</i></p> <p><b>Equality Commission</b> <i>Given the impact of education deprivation at primary school level on post-primary attainment and educational outcomes, we believe that the inclusion of a measure of primary attainment is crucial to the measure of education deprivation. It is important that where suitable indicators of sufficient quality are not available, further work should be progressed at the earliest possible opportunity to address these issues.</i></p> <p><b>Belfast City Council</b> <i>The council would contend that the selected indicators (especially the lack of early years' assessment indicators) do not reflect part of the purpose of this domain, i.e. to identify the prevalence of poor educational outcomes for children.</i></p> <p><b>Newry, Mourne &amp; Down District Council</b> <i>NMDDC note the lack of data relating to early years and primary school attainment ... this should be addressed to allow for inclusion in subsequent releases of the Multiple Deprivation Measurements.</i></p> <p><b>Belfast City Council</b> <i>Consideration could therefore be provided for including an indicator related to pre-school experience.</i></p>	<p>The deprivation team and the domain expert group were unable to identify suitably robust information at the small area level that meets the agreed indicator criteria. The impact of attainment in the early years is arguably indirectly captured to a degree by the other indicators in the education, skills and training deprivation domain.</p> <p>The current PfG aims to develop an indicator relating to children's stage of development in their immediate pre-school year; this data may become available for consideration in future updates.</p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Mid Ulster District Council</b>  <i>Other indicators not mentioned but which might potentially be considered are access to Pre-school provision [and] Childcare.</i></p> <p><b>Equality Commission</b>  <i>we recommend that data on access to childcare facilities and cross-community movement should be made available.</i></p> <p><b>Donagh Development Association</b>  <i>childcare services should also be included such as Afterschools clubs and registered all day care provision</i></p> <p><b>Náiscoil an Traonaigh</b>  <i>We feel that access to preschool education, all day childcare provision (registered) and afterschools clubs should be included in the list of services</i></p> <p><b>Erne East Community Partnership</b>  <i>registered childminding/ childcare crèche services would be a good addition as these facilitate social and economic development.</i></p> <p><b>Anonymous MLA</b>  <i>Additional services welcome but need to include preschool education for which there is no transport provided, registered day care and afterschools clubs.</i></p> <p><b>Fermagh Rural Community Network</b>  <i>Childcare [should be included]</i></p> <p><b>Derry City and Strabane District Council</b>  <i>One area of concern with the lack of a childcare indicator being incorporated</i></p>	<p>This issue is also discussed in the Blueprint document:</p> <p><i>'The consultation document reflected on this, and initially argued that given (i) the widespread availability of childminders and (ii) the absence of information on available places and non registered childcare provision (e.g. provided by family/ friends), it should not be included. However, following the consultation responses, this issue was re-examined and discussed with the domain expert group and it was concluded that crèches and day nurseries should be included as an additional service.'</i></p>
<p><b>Belfast City Council</b>  <i>The council would seek clarification as to whether 'Libraries' include the mobile library service.</i></p>	<p>The Department for Communities include mobile libraries in their publications. The expert group felt that they should therefore also be included in the access to services domain.</p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>CCEA</b>  <i>schemes such as the Northern Ireland Broadband Improvement Project and the Superfast Extension Programme are rapidly expanding the availability of high-speed broadband across Northern Ireland, which may make [speeds below 10 MBs] irrelevant in the short-term.</i></p> <p><b>Belfast City Council</b>  <i>schemes such as the Northern Ireland Broadband Improvement Project and the Superfast Extension Programme are rapidly expanding the availability of high-speed broadband across the region, which may make [speeds below 10 MBs] irrelevant in the short-term.</i></p> <p><b>NI Local Government Association</b>  <i>schemes such as the Northern Ireland Broadband Improvement Project and the Superfast Extension Programme are rapidly expanding the availability of high speed broadband across the region, which may make this measure more sharply focussed and requiring a quantitative review in the short-term.</i></p> <p><b>Derry City and Strabane District Council</b>  <i>query as to why the threshold of 10Mbs is lower than that set out in the Programme for Government, i.e. 30Mbs?</i></p> <p><b>Newry, Mourne &amp; Down District Council</b>  <i>areas where broadband coverage is not available at all or only available at speeds lower than 2mb should be considered the most deprived under this indicator.</i></p>	<p>This issue is also discussed in the Blueprint document.</p> <p><i>‘deprivation is concerned with minimum requirement not being met. Ofcom stated that a connection speed of 10Mbit/s is required to deliver an acceptable broadband user experience for a typical household. Secondly, indicator criterion b stipulates that the indicator should represent a major feature of that form of deprivation rather than deprivation affecting a small number of people or particular types of area in Northern Ireland, to enable ranking of all small geographical areas. There will be many areas where all households are unable to reach the connection speed if the threshold is set higher.’</i></p>
<p><b>Belfast City Council</b>  <i>Consideration should also be given to including Household Recycling Centres within the list of proposed services.</i></p>	<p>The domain expert group were of the view that a recycling centre is not a key service, particularly given the provision of recycling services at the household level. In addition, some Councils have a policy that their recycling centres can only be used by their residents. In such cases, access is dependent on council boundaries rather than proximity.</p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>College of Occupational Therapists</b> <i>If GPs and dentists are specifically mentioned then this should also include Allied health professionals such as occupational therapists.</i></p> <p><b>Erne East Community Partnership</b> <i>Lack of access to chiropody can lead to personal neglect. Addiction and mental health services to personal crisis, citizen advice to claiming benefits.</i></p>	<p>The domain expert group concluded that some of the services in question were specialist in nature and, as such, could require a referral from a GP or hospital. In some instances the services are provided in health centres and, as such, will be covered by the travel times to GPs.</p>
<p><b>Rural Community Network</b> <i>if a person lives in a household in a rural area with no, or limited, access to a car and limited access to public transport then their ability to access the services identified in the domain will be constrained.</i></p>	<p>The public transport model will take this into consideration when setting the assumptions on maximum walking time, transfer time, walking speed and maximum total journey time.</p> <p>Although we recognise that the model results cannot cover each individual's circumstances, it is considered to be a major improvement from NIMDM 2010 when only private transport was considered.</p>
<p><b>Armagh, Banbridge &amp; Craigavon Council</b> <i>further consideration should be given to the frequency and timing of public transport</i></p> <p><b>Naíscoil an Traonaigh</b> <i>frequency of buses also needs to be considered</i></p> <p><b>Fermanagh Rural Community Network</b> <i>public transport is only available on many of the rural routes once a day or in many instances only a few days in the week.</i></p> <p><b>Derry City and Strabane District Council</b> <i>public transport is less frequent in rural areas</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>In many rural areas, public transport routes are serviced only once per day or, often less.</i></p>	<p>This issue is also discussed in the Blueprint document.</p> <p><i>'The public transport model that will be used is based on time tables and assumptions on departure/arrival times of a journey, changeover time, walking speed, and maximum walking/travel time. While every care will be taken in terms of setting the parameters within the model in order to try and represent the reality on the ground, it will not be viable to capture all eventualities. Having said that, it is expected that, despite these shortcomings, the service-weighted average travel time will be reflective of the ranking of areas according to their accessibility by public transport.'</i></p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Naíscoil an Traonaigh</b> <i>it needs to be taken into account that ... alternatives [to BT broadband] are much more expensive</i></p>	<p>This indicator will identify areas with poor broadband speeds. When living in such area, it is a matter of personal choice whether to put up with these slow speeds or to purchase an alternative faster option.</p>
<p><b>Equality Commission</b> <i>we recommend that data on ... cross-community movement should be made available.</i></p> <p><b>Belfast City Council</b> <i>believes that this domain should therefore take peace lines and physical barriers into account when measuring these indicators.</i></p> <p><b>NI Local Government Association</b> <i>should also take into account other barriers to access to services including segregation and perceptions of territory and safety.</i></p> <p><b>Community Relations Council</b> <i>disappointing that ... unable to identify a suitable indicator to measure barriers to cross-community movement</i></p>	<p>This issue is also discussed in the Blueprint document.</p> <p><i>'it would be important to take account of all barriers which effectively increase distance to services for whatever reason (e.g. peace lines). However, there are practical problems which make this impossible to achieve in a consistent, coherent way that would satisfy the agreed indicator criteria. For example, it is difficult to be precise about the exact number, location and 'severity' of interface barriers, partly due to the invisibility of some, and partly because there is uncertainty about the status/continuity of some barriers, which may be affected by what is happening socially and/or politically at any given time. In addition, there is no way of knowing how many members of an interface community actually decide not to use the nearest service if it is in the wrong territory and regularly make a longer journey to a 'safe' service.' Finally some of the interfaces may actually span the geographical unit of analysis, creating challenges for the relative ranking that would be assigned to areas'</i></p>
<p><b>Belfast City Council</b> <i>take into consideration the congestion within Belfast and other urban areas, especially during peak travel times.</i></p>	<p>The domain expert group were unable to identify a suitable information source that would enable this to be robustly reflected in the average travel times to the various services. The group did however note that it would be reflected to a degree in the public transport travel times through the incorporation of public transport timetables, which already take into account the longer travel times and peak times.</p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Erne East Community Partnership</b> <i>[include] police stations</i></p>	<p>The domain expert group felt that people are more likely to ring the police than visit their 'local' police station. The group were also of the view that living closer to a police station would not necessarily lead to faster response times.</p>
<p><b>Donagh Development Association</b> <i>time and distance has to have a central point but it does not favour rural areas where only a small minority live near the central point</i></p> <p><b>Naíscoil an Traonaigh</b> <i>services listed are measured from a central point ... whereas most of [rural] dwellers live several miles from the central point</i></p> <p><b>Anonymous MLA</b> <i>public transport travel times do not recognise that rural dwellers have further to travel in order to access public transport</i></p> <p><b>Fermanagh Rural Community Network</b> <i>the only public transport available is Bus and the closest bus stop for many households is at least 3 miles away from the home accessible only by country roads that have no footpaths, lighting and often a poorly maintained surface.</i></p> <p><b>Derry City and Strabane District Council</b> <i>in rural areas ... access to this public transport requires a separate journey in itself, usually involving a form of private transport.</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>In a rural area, the closest bus stop (there is no rail system) is likely to be at least 2 or 3 miles away from the home. The road is unlikely to have a footpath, the surface is likely to be uneven and the terrain challenging.</i></p>	<p>This issue is also discussed in the Blueprint document.</p> <p><i>'The public transport model that will be used is based on time tables and assumptions on departure/arrival times of a journey, changeover time, walking speed, and maximum walking/travel time. While every care will be taken in terms of setting the parameters within the model in order to try and represent the reality on the ground, it will not be viable to capture all eventualities. Having said that, it is expected that, despite these shortcomings, the service-weighted average travel time will be reflective of the ranking of areas according to their accessibility by public transport.'</i></p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Fermanagh Rural Community Network</b> <i>we would ask that the data used is checked for accuracy as the story on Broadband speeds experienced by rural households often differs greatly from published data</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>the Council has issues regarding the veracity of this OFCOM data</i></p>	<p>The deprivation team is working closely with Ofcom to explore the quality and accuracy of broadband speed information.</p> <p>Published data will be accompanied by a detailed description, including any known short-comings, in accordance with the Statistics Authority's guidelines.</p>
<p><b>Belfast City Council</b> <i>an explanation is also requested on the terms 'Large Service Centre' and 'Other general services'</i></p>	<p>Other general services include some specific frequently used services such as, filling stations, health and beauty establishments, (fast) food and social establishments.</p> <p>Large Service Centres are selected based on the range of services they provide. It includes all settlements with a population in excess of 10,000 people, plus some smaller settlement that, often due to their relative remoteness, provide a wider range of services.</p>
<p><b>Erne East Community Partnership</b> <i>The following additional services should be considered- daycare for older people , meal-on wheels</i></p> <p><b>Fermanagh Rural Community Network</b> <i>Daycare provision for Older People [should be included]</i></p>	<p>The domain expert group recognised the importance of such services to those who routinely availed of them. However, they were unable to identify information sources that comprehensively and consistently captured the full spectrum of daycare services provided to the elderly (e.g. services provided by community groups). As such, the domain expert group was unable to recommend the inclusion of an appropriate indicator.</p>
<p><b>Fermanagh Rural Community Network</b> <i>Further Education Provision [should be included]</i></p>	<p>Further Education Provision is already catered for through the inclusion of large Service Centres.</p>
<p><b>Derry City and Strabane District Council</b> <i>Is it possible to include access to Community Centres, Private sporting/ leisure facilities [and] Sport facilities (not owned by Council)?</i></p>	<p>Council leisure centres have been included as a service as they are open to all members of the public. Private sporting facilities may be restricted to members only.</p>

## Access to Services Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Age NI</b> <i>it is important that measures under [this] Domain capture the experiences and circumstances of older people</i></p>	<p>The indicators and services in this Domain are selected based on their importance to the whole population, but recognises that they may differ for certain sections of society. It is the aim of the deprivation team that detailed information for this domain will be published to allow users to tailor it for their purposes.</p>

## Living Environment Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Mid Ulster District Council</b> <i>it would be important not to lose the indicator for homelessness but recognize the difficulties with obtaining accurate data.</i></p> <p><b>Equality Commission</b> <i>We recommend that the NISRA develop indicators in relation to homelessness in the Living Environment Domain, given that this group is vulnerable to multiple deprivation in all other domains.</i></p> <p><b>Roslea Community Association</b> <i>The shortage of houses is becoming a problem</i></p>	<p>Data on homeless presentations are reported by location of presentation. The NI Housing Executive has advised that it is unable to provide comprehensive data on the last permanent address of homeless applicants. There may also be regional differences in the attitudes towards registering as homeless. For these reasons, the domain expert group recommended that homelessness is not included as an indicator.</p>
<p><b>Mid Ulster District Council</b> <i>Access to Green/Recreation space was also felt to be important</i></p> <p><b>Belfast City Council</b> <i>The council suggests that proximity to green and open spaces and air quality could be included</i></p> <p><b>Rural Development Council</b> <i>Outdoor Physical Environment sub-domain ... includes an indicator to account for both the availability and quality of public/amenity space, to account for the relative lack of access to public space for recreation, play and health related activities, particularly in rural areas.</i></p>	<p>This issue is discussed in the Blueprint document.</p> <p><i>'The domain expert group felt that considerable effort and time would be required to define, identify and agree a comprehensive list of accessible green spaces. The group felt that the detailed work required, which would require the full cooperation of each district council, could not be completed within the timescales of the current update. The group also had reservations that the collection of such information may not enable all areas to be ranked, for example, should some areas have no such green spaces. Perceptions of green spaces may well differ between urban and rural areas.'</i></p>
<p><b>Mid Ulster District Council</b> <i>Another key indicator not included is Rental Values/Charges in the private rented sector given the continued rise in provision by private landlords and rising rental costs for property despite the current economic climate.</i></p> <p><b>Belfast City Council</b> <i>The council would recommend that consideration could be given to including a measure of housing affordability within the 'Housing Access' sub-domain.</i></p>	<p>Unfortunately this won't be possible as household costs of this nature, which accord with the agreed deprivation indicator criteria, are not currently available at a low enough geographical level to support the current deprivation update. This is highlighted in the Blueprint document under the Income Domain.</p>

## Living Environment Domain

Comments by Organisation	Response from Deprivation Team
<p><b>College of Occupational Therapists</b> <i>allow people with disabilities to access their local towns, transport and buildings etc.</i></p>	<p>This issue is addressed in the Access to Services Domain.</p>
<p><b>College of Occupational Therapists</b> <i>living environments should not feel intimidating</i></p> <p><b>Community Relations Council</b> <i>disappointing that ... unable to identify a suitable indicator to measure interface areas</i></p> <p><b>Belfast City Council</b> <i>the council believes that the locations of peace lines provided to NISRA from the NIO should also be included within this sub-domain</i></p>	<p>This issue is dealt with under the Access to Services Domain. The current position is unchanged from when this issue was discussed in the NIMDM 2005 blueprint:</p> <p><i>‘Although it is important to take into account all barriers which effectively increase distance to services – and this would include peace lines and the like - there are practical problems which make this impossible to achieve in a consistent, coherent way. First, it is difficult to be precise about the exact number of interface barriers, partly due to the invisibility of some, and partly because there is uncertainty about the continuity of some barriers. Second, there is no way of knowing how many members of an interface community actually decide not to use the nearest service if it is in the wrong territory and regularly make a longer journey to a ‘safe’ service.’</i></p>
<p><b>Roslea Community Association</b> <i>Global warming and the resulting flood areas needs to be given a higher priority</i></p>	<p>Information regarding Global Warming is not available at a low enough geographical level to support the current deprivation update.</p> <p>Information regarding flood risk will however be included.</p>
<p><b>Rural Community Network</b> <i>Housing Access sub-domain should receive a higher weighting</i></p> <p><b>CCEA</b> <i>The outdoor physical environment sub domain is an important element of the Living Environment domain</i></p>	<p>Both respondents, who champion higher weights for different sub-domains, did not state which of the other sub-domains should receive a lower weighting. The domain expert group agreed to retain equal weights for all sub-domain indicators.</p>

## Living Environment Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Belfast City Council</b> <i>outdated Census data</i></p> <p><b>Derry City and Strabane District Council</b> <i>areas would not be correctly incorporated, within the proposed measures, if they have no associated responses from the 2011 Census</i></p>	<p>The Census data are less out of date than perceived, especially when compared with other indicators that rely on a number of years of data to be robust.</p> <p>In absence of other robust data the expert group felt it unlikely that a large change would have occurred since 2001, and given its quality and coverage, that the proposed indicators should still be included.</p>
<p><b>Belfast City Council</b> <i>identifying households of multiple occupancy would be a better indicator [than overcrowding]</i></p>	<p>This issue was addressed in the NIMDM 2010 report:</p> <p><i>“The use of information on ‘Houses in Multiple Occupation’ (HMO) was suggested as an alternative indicator of overcrowding in the consultation responses. The peer review team was asked to consider whether the HMOs recorded by the NIHE could be used as an indicator of overcrowding, or if there were alternative sources of information on overcrowding that could be employed. The peer review team recommended that HMOs were not included in the Living Environment Domain as it measures a different phenomenon to overcrowding. Specifically the definition of an HMO is ‘a house occupied by more than 2 qualifying persons, being persons who are not all members of the same family’.<sup>12</sup> As such the HMO data could include a student household but exclude a large family living in overcrowded conditions.”</i></p>
<p><b>Rural Development Council</b> <i>facilities are less accessible to those in rural areas where land is primarily in private ownership and where roads often have no footpaths or street lighting and are therefore often not safe for use from both a road safety perspective, as well as in considering the wider issue of personal safety in general.</i></p>	<p>Whilst the deprivation team and the domain expert group considers this a valid concern, it will not be possible to rank all small areas as there will be many, predominantly in urban areas, where all roads have footpaths and street lighting.</p>

## Living Environment Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Naíscoil an Traonaigh</b> <i>Feel that empty building i.e. dereliction should be included</i></p> <p><b>Erne East Community Partnership</b> <i>I think it might be a useful addition to consider areas of dereliction and ghost housing developments as factors.</i></p> <p><b>Anonymous MLA</b> <i>Need to include dereliction as another indicator of deprivation</i></p> <p><b>Fermanagh Rural Community Network</b> <i>would ask that data is sourced from Land and Property Services on the numbers and locations of vacant non-domestic buildings</i></p> <p><b>Fermanagh and Omagh District Council</b> <i>The Council feels there is a gap in relation to vacant buildings that is not sufficiently addressed in the response to recommendation 14c.</i></p> <p><i>The Council proposes the inclusion of ... the number of non-domestic buildings that are vacant, expressed as a percentage of all non-domestic buildings.</i></p>	<p>This issue is also addressed in the Blueprint Document.</p> <p><i>'The Land &amp; Property Service, which maintains a database of domestic and non-domestic buildings, does not record the state of these buildings. However, vacant sites and vacant/boarded up buildings are one of the possible local area problems that are captured by the Housing Conditions Survey and included in the outdoor physical environment sub-domain.'</i></p>
<p><b>Newry, Mourne &amp; Down District Council</b> <i>properties at high risk of regular flooding that should be identified under this indicator.</i></p>	<p>Where available, the deprivation team will make use of information on the probability and proximity to flood areas when ranking areas.</p>

## Crime and Disorder Domain

Comments by Organisation	Response from Deprivation Team
<p><b>St. Peters Immaculata Youth Club</b> <i>How does the system measure unreported crimes.</i></p>	<p>The domain expert group agreed that the current position remains unchanged from when it was addressed in the NIMDM 2010 report:</p> <p><i>Research carried out by the NIO using the NICS 2007/08 however gave inconclusive results on the relationship between deprivation and reporting rates. As such, the recorded crime rates for Violence, Robbery and Public Order, Burglary, Vehicle Theft and Criminal Damage will be included in the Crime Sub- Domain without adjustment.</i></p>
<p><b>Belfast City Council</b> <i>we would also recommend that as applied in other deprivation measures, theft could be included as an indicator.</i></p> <p><b>Consumer Council</b> <i>Please could NISRA consider collecting and presenting data on energy theft</i></p>	<p>This issue is also addressed in the Blueprint Document.</p> <p><i>‘English and Welsh deprivation measures already include theft as an indicator in their crime / community safety domains. After discussion with the domain expert group, it was decided to include theft as the fifth indicator in the crime sub domain.’</i></p> <p>Energy theft, including theft of heating oil and tampering with metering, will be captured in the new ‘Theft’ indicator.</p>
<p><b>College of Occupational Therapists</b> <i>It is unclear why hate crimes or crimes against certain groups are not included.</i></p> <p><b>Equality Commission</b> <i>We recommend that the Crime and Disorder Domain should record domestic violence and hate crime separately as this would ensure the appropriate targeting of services at a local spatial level.</i></p>	<p>This issue is also addressed in the Blueprint Document.</p> <p><i>‘the level of underreporting means that specific indicators constructed from police data alone would not be sufficiently robust to warrant inclusion. Unfortunately there are no alternative datasets collected consistently across Northern Ireland that could be incorporated to strengthen the police data and therefore it is proposed that domestic violence offences are retained within the violence category of police recorded crime data.’</i></p>

## Crime and Disorder Domain

Comments by Organisation	Response from Deprivation Team
<p><b>Rural Community Network</b>  <i>RCN is of the view that the violence, (sexual offences), robbery and public order indicator should receive a higher weighting when indicators are combined under the Crime sub-domain.</i></p>	<p>The respondent did not indicate which other indicator(s) should receive a lower weighting. The deprivation team will use factor analysis to determine weights for each indicator in the crime sub-domain.</p>
<p><b>Belfast City Council</b>  <i>The council would enquire whether the indicators associated with the Crime and Disorder domain are calculated as frequencies, i.e. expressed as a proportion of the entire population.</i></p>	<p>All indicators in the crime and disorder domain will be calculated as a proportion of the population at risk: total populations from Small Area Population Estimates plus the non-resident workplace population from the 2011 Census will be utilised.</p>
<p><b>Erne East Community Partnership</b>  <i>Removal of police stations and community policing from isolated areas may lessen the chances that people will report crimes as they will take into account the time it will take the police to respond and the reduced visible presence of the police service.</i></p>	<p>The domain expert group felt that people are more likely to ring the police when they need them rather than physically go to a police station. Analysis of the NI Crime Survey found no evidence of differential reporting rates in urban and rural areas.</p>
<p><b>Age NI</b>  <i>believes that measures and data collection should be inclusive of the needs and experiences of older people and we recommend that data collected be disaggregated and be reported on.</i></p>	<p>For reasons of confidentiality, crime data do not include information on the age of victims.</p>

# Domain Weights

## Comments by Organisation

### **Donagh Development Association**

*[Employment] and Income domain account for 50% of MDM which I feel is too high and that perhaps both should be reduced to at least 20%.*

*Income and Employment with half the total weighting is too high and too much reliance on numbers on benefits*

### **Naíscoil an Traonaigh**

*Income and Employment account for half total weightings and they are very much linked - 50% is too high*

### **Anonymous MLA**

*Income and Employment are heavily weighted at 50% and should be lowered*

### **Belfast City Council**

*we agree that the 'Income' and 'Employment' domains should carry more weight than the other domains, as supported by Townsend's research and other academic findings.*

### **Armagh, Banbridge & Craigavon Council**

*Both income and employment remain the key issues when considering levels of deprivation.*

### **Donagh Development Association**

*[Living environment] domain should have an increased weighting of 10% or more*

### **Anonymous MLA**

*[Living environment] weighting of just 5%, it is unlikely to make any difference to the overall MDMs hence reason weighting need to change.*

**Fermanagh Rural Community Network** *recognise that a lot of work has been done to broaden the scope of this domain but feel that if the domain weighting is not increased this will have very limited impact on the NIMDM 2017 and overall ranks.*

### **Fermanagh and Omagh District Council**

*It is noted that the Living Environment Domain accounts for only 5% of the NIMDM, and thus the additional work may not have an impact on the overall NIMDM 2017.*

### **College of Occupational Therapists**

*As the living environment has a strong impact, we would suggest it is given a higher weighting.*

### **Roslea Community Association**

*I believe that a higher weighting needs to be given to [Access to Services] domain. 15 is not high enough.*

### **Donagh Development Association**

*[Access] to Services should be weighted at 15% at least as it is hugely important to rural areas in order to maintain services locally*

# Domain Weights

## Comments by Organisation

**Fermanagh Rural Community Network** *the current weighting of 10% is in no way giving an accurate measurement of how not being able to access services leads to deprivation.*

**Naíscoil an Traonaigh**

*Access to services very poor rating and should be at least 15% weighting*

**Erne East Community Partnership**

*I believe that the [Access] to Service Domain is considerably under scored ... need to increase this score by 10%*

**Derry City and Strabane District Council**

*Access to Services Domain should be weighted higher*

**Roslea Community Association**

*I believe a similar weight should be given to each domain*

**Fermanagh Rural Community Network**

*all domains being given equal weighting is especially taken in to account in regards [Access to Services] domain.*

**Donagh Development Association**

*we would welcome a change so that the individual domains are more evenly weighted*

*there is too much emphasis on MDMs and much less on individual domains - lower rating domains given much less consideration by funding bodies.*

**Naíscoil an Traonaigh**

*We would favour weighting to be equal in value*

**Anonymous MLA**

*I would suggest that all domains are weighted equally at approx just under 15% each*

**Fermanagh Rural Community Network**

*each domain weighting used in MDM is weighted equally, as each individual domain would be more prominence to be used on their own merit, and be used to better affect to assess deprivation.*

**Fermanagh and Omagh District Council**

*strongly advocates for a reconsideration of the domain weightings ... each domain be weighted equally (14.29%).*

**Rural Community Network**

*concerned that the document contains no discussion on the rationale for the current domain weights*

**Donagh Development Association**

*Proximity to services, Education, Living Environment and Crime and Disorder need to have increased ratings*

## Domain Weights

### Comments by Organisation

**Anonymous MLA**

*bigger % in Access to Services, Crime and Disorder and the living environment*

**Erne East Community Partnership**

*If a new domain was added for population decline it would also be helpful.*

**Rural Development Council**

*need to create an awareness around the Access to Services domain as this is one of the main indicators largely used within a Rural context in relation to policy development and associated rural issues.*

**Newry, Mourne & Down District Council**

*Consideration should be given to assigning a higher weighting to crime and disorder.*

**RESPONSE FROM THE DEPRIVATION TEAM**

The Blueprint document presents an analysis of all comments made on domain weights.

These views were brought to the Steering Group. Its members acknowledged the various preferences for the domain weights that had emerged through the consultation, noting that the comments should be considered in the context of the improvements being brought to a number of indicators within the domains. After a considered and lengthy discussion the Steering Group concluded that, on balance, the consultation responses had not provided a robust rationale for changing the domain weights from those that had been deployed in the 2010 measures. The Steering Group was instead in favour of educating users in how to work with domains for particular policy needs.

## Non Domain-specific recommendations

Comments by Organisation	Response from Deprivation Team
<p><b>CCEA</b> <i>From an educational point of view, it is important that consideration is given to developing a bespoke MDM for children, which would significantly help in developing and targeting interventions at children in greatest need of support.</i></p>	<p>The Deprivation team will consider the feasibility of developing a child specific multiple deprivation measure once the data have been processed – this was one of the recommendations from the NIMDM 2010. Its methodology has yet to be developed.</p>
<p><b>College of Occupational Therapists</b> <i>not clear why the full methodological review was ruled out</i></p> <p><b>Rural Community Network</b> <i>several of the issues RCN would like to see addressed are beyond the scope of this review</i></p> <p><b>Equality Commission</b> <i>it would be timely to review this approach</i></p>	<p>This issue is discussed in the Blueprint document. A full methodological review was considered to be out of the scope of the update on the grounds of timing and costs.</p>
<p><b>College of Occupational Therapists</b> <i>co ordinates with what the PfG is going to try and achieve.</i></p> <p><b>Equality Commission</b> <i>the methodological approach should be considered within the context of Northern Ireland Programme for Government (PfG) outcomes , associated indicators and other public sector requirements for information on deprivation.</i></p>	<p>The draft Programme for Government (PfG) set out targets <i>‘that captured the sense of ambition the Executive has for our society’</i>. Deprivation aims to measure current levels of deprivation. The PfG uses deprivation to identify areas to be targeted and monitored.</p>
<p><b>Armagh, Banbridge &amp; Craigavon Council</b> <i>whether an older people specific multiple deprivation measure would be possible</i></p>	<p>Similarly to the Child Specific MDM, the Deprivation team will consider the feasibility of developing an older people specific multiple deprivation measure once the data have been processed.</p>
<p><b>Armagh, Banbridge &amp; Craigavon Council</b> <i>where possible summary measures and indicator data also be made available for the current electoral wards and district electoral areas.</i></p>	<p>NISRA has recognised the user need for deprivation statistics for the new electoral Wards. It will endeavour to create deprivation measures for this geography but by necessity these will be on an approximated basis.</p>
<p><b>Rural Community Network</b> <i>welcome the recommendation on incorporating a measure of population decline as a new domain</i></p>	<p>This issue links to a non-domain specific recommendation, which is discussed in the Blueprint document.</p>

## Non Domain-specific recommendations

### Comments by Organisation

### Response from Deprivation Team

<p><b>Erne East Community Partnership</b> <i>Strongly agree that population decline is added as a new domain</i></p> <p><b>Derry City and Strabane District Council</b> <i>welcomes the fact that further investigation is to be carried out into the potential association between deprivation and population decline.</i></p> <p><b>Rural Development Council</b> <i>welcome the consideration given to the proposed additional Domain to assess the possible linkages between deprivation and depopulation</i></p>	<p>Work will be undertaken, in conjunction with NISRA's population estimates team, to explore the potential association between population decline and deprivation.</p>
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