

Welsh Government

Consultation – summary of responses

Proposed indicators for the Welsh Index of Multiple Deprivation (WIMD) 2014

30 June 2014

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1 Introduction

The Welsh Index of Multiple Deprivation (WIMD) is the Welsh Government's official measure of relative deprivation for small areas in Wales. It is designed to identify those small areas where there are the highest concentrations of several different types of deprivation. It is a National Statistics product and is produced by statisticians at the Welsh Government.

The latest Index was published in 2011. Information on WIMD 2011 is available on the Welsh Government website:

www.wales.gov.uk/statistics

An updated Index will be published in late 2014, using more up-to-date data and improved indicators based on lessons learnt from the production of previous Indexes. We are working towards a November 2014 publication date.

Between 28 November 2013 and 27 February 2014 a consultation was held on proposed indicators for WIMD 2014. The purpose of this consultation was to expose proposals for the domains and indicators for WIMD 2014 to critical review. We consulted at this stage to allow time for consultation responses to be acted upon, where possible, prior to finalising the details for WIMD 2014. The consultation document is available on the Welsh Government website:

<http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?lang=en>

This document provides a summary of the responses to the consultation, a summary of recent work and it outlines changes made in light of consultation responses.

2 Summary

The aim of the WIMD consultation was to seek user views on proposals for WIMD 2014 indicators. In order to develop the indicator proposals, statisticians at the Welsh Government worked with seven expert topic groups to review indicators used in WIMD 2011 and to consider potential new indicators. Issues raised in previous consultations were also considered. Wherever possible the proposed indicators conformed to a list of indicator criteria. Full details of the proposed indicators for WIMD 2014 were listed in Section 5 of the consultation document:

<http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?lang=en>

Two consultation webinars (online seminars) were held during the consultation period. These sessions included a presentation on the proposals and provided users an opportunity to ask questions. In addition, proposals were shared with the Welsh Statistical Liaison Committee.

2.1 Consultation respondents

29 responses were received from a range of different organisations including local authorities, health boards, third sector organisations and a number of other public sector organisations. A full list of consultation respondents can be found at Annex A. Individual responses are published at: <http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?lang=en>

Not all respondents answered all questions.

The views of expert groups such as the external WIMD Advisory Group and the Welsh Statistical Liaison Committee were also considered as part of the consultation exercise. A membership list of the WIMD advisory group is available at Annex C of the original consultation document.

2.2 Recent work

All consultation responses and the views of the Domain, Steering and Advisory groups were carefully considered. Each suggestion was considered alongside the indicator criteria outlined in Section 4.2 of the consultation document, as well as the definitions for each domain. Some of the suggestions were therefore considered not suitable.

In light of the responses, additional work has been undertaken to further investigate and assess the feasibility of new indicators (e.g. off-gas, digital inclusion and carers). The views of the WIMD expert domain groups were sought in light of this additional work, and final decisions have been taken by the WIMD Steering group.

A summary of recent work is provided at the appropriate point in sections 3-11. Technical papers detailing some of this work are also available at:

<http://wales.gov.uk/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>

2.3 Summary of changes made in light of consultation and recent work

Sections 3-12 of this document provide a summary of the consultation responses. Below is a summary of the changes made in light of consultation responses and recent work. Section 2.4 provides a summary of the differences between indicators for WIMD 2011 and WIMD 2014.

Income (Section 3)

We note the support for the exclusion of contribution based Job Seekers Allowance claimants. Although initial discussions indicated that this may be possible, the Department for Work and Pensions have stated that this is not possible, therefore we will include those who are on contribution based Job Seekers Allowance. This is consistent with the approach in WIMD 2011.

Employment (Section 4)

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

Health (Section 5)

We note the support for an indicator on Diagnosed Chronic Diseases. For practical reasons, it is now not possible to include such an indicator in WIMD 2014, but we will continue to investigate this as a data source for future Indexes.

Whilst acknowledging the important contribution of Carers, we have concluded that it's not appropriate to include an indicator on one sub-set of the population (such as carers). The ill-health of carers is captured through other indicators in the health domain.

Education (Section 6)

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

Access to Services (Section 7)

We have investigated the use of 2011 Census data on car ownership to weight the average road travel times together with average public transport travel times. We commissioned a household level data table from the 2011 Census (at LSOA level) - number of cars in household by number of people aged 17 and over in household. We subsequently looked at three options for weighting public and private transport. The selected method estimates the number of adults that have access to a car based on the number of adults and cars within the household.

We have recently explored the suitability of Ofcom data for an indicator on digital inclusion, and found that the data may be a suitable source for fixed line broadband data. We will continue to review potential indicators in combination with 'not spots' data, and if a suitable indicator can be calculated we will include it within the Access to Services domain.

Community Safety (Section 8)

We note the support for an indicator on Anti Social Behaviour. We have carried out some initial analysis on the suitability of using Anti Social Behaviour data, and we will include an indicator in WIMD 2014 if updated data received over the summer is deemed suitable.

We are also reviewing the denominator for the police recorded theft, criminal damage and violent crime indicators. We are investigating the impact of removing the day-time population element of the denominator, as this data is only available from the Census and increases the denominator by approximately one million people in Wales.

Physical Environment (Section 9)

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

Housing (Section 10)

We note the significant concerns raised about this domain and the lack of data on housing deprivation. Several consultation respondents agreed that an indicator on central heating should be dropped. In light of a couple of consultation responses, we explored the possibility of including an off-gas indicator but concluded that this was not suitable (see section 10).

We agree that an indicator on lack of central heating is not a strong indicator of housing deprivation. However we do not think it appropriate that the Housing domain include only one indicator (overcrowding). We will therefore include an indicator on 'Proportion of people in households without central heating', (as used in earlier WIMDs) as a proxy for housing quality. In recognition of the fact that 'lack of central heating' is becoming an increasingly poor indicator of housing quality over time, we propose to lower its weight within the domain to 1/3 (with the overcrowding indicator assigned a 2/3 weighting).

Child Index (Section 11)

We will continue with plans to publish a Child Index in 2015, and will subsequently look to further develop the annual indicator data publication.

General (Section 12)

We have considered the numerous comments made relating to 'rural deprivation'. As noted in the consultation document, deprived people in rural areas tend to be more geographically dispersed than in urban areas. Therefore, pockets of deprivation in rural areas tend to be on a considerably smaller scale than even the small scale geography at which WIMD is produced. We will ensure that this is clearly explained in the WIMD guidance and communication documentation.

We propose to address some of the issues raised in the consultation by publishing a statistical article as part of the WIMD publication package providing guidance on how WIMD and its indicators can and can't be used to analyse deprivation in rural areas.

We will continue to prepare comprehensive guidance more generally on how the WIMD can be used and any limitations.

2.4 Summary of changes between WIMD 2011 and WIMD 2014

| | WIMD 2011 | WIMD 2014 |
|---|-----------|-------------|
| Income Domain | | |
| Income deprivation composite indicator | Yes | Yes |
| Employment Domain | | |
| Proportion of working-age population on Employment related benefits | Yes | Yes |
| Health Domain | | |
| Cancer incidence | Yes | Yes |
| Long Term Limiting Illness | Yes | Yes |
| Low Birth Weight | Yes | Yes |
| All Cause Death Rate | Yes | Yes |
| Education Domain | | |
| Key Stage 2 Average Point Score | Yes | Yes |
| Key Stage 3 Average Point Score | Yes | No |
| Key Stage 4 Average Wider Point Score | Yes | No |
| Key Stage 4 Average Capped Point Score | No | Yes |
| Key Stage 4 Level 2 Inclusive | No | Yes |
| Primary School Absence | Yes | No |
| Secondary School Absence | Yes | No |
| Repeat Absenteeism | No | Yes |
| Proportion of people not entering Higher Education aged 18-19 | Yes | Yes |
| Number of Adults aged 25-64 with No Qualifications | Yes | Yes |
| Access to services | | |
| Methodology - Inclusion of public transport | Yes | Yes |
| Methodology - Inclusion of private transport | No | Yes |
| Food shops | Yes | Yes |
| GP surgeries | Yes | Yes |
| Primary schools | Yes | Yes |
| Secondary schools | Yes | Yes |
| Post office | Yes | Yes |
| Public library | Yes | Yes |
| Leisure centre | Yes | Yes |
| Dentist | Yes | No |
| Transport node | Yes | No |
| Pharmacies | No | Yes |
| Petrol stations (private transport only) | No | Yes |
| Fixed line broadband | No | If possible |

| | WIMD 2011 | WIMD 2014 |
|--|-----------|-------------------------------|
| Community Safety | | |
| Police recorded burglary | Yes | Yes |
| Police recorded criminal damage | Yes | Yes |
| Police recorded theft | Yes | Yes |
| Police recorded violent crime | Yes | Yes |
| Fire incidences | Yes | Yes |
| Anti Social Behaviour (ASB) | No | If possible |
| Percentage of adult offenders | Yes | If ASB indicator not possible |
| Percentage of youth offenders | Yes | If ASB indicator not possible |
| Physical Environment | | |
| Households at risk of flooding | Yes | Yes |
| Air Quality – Air Emissions | Yes | Yes |
| Air Quality – Air Concentrations | Yes | Yes |
| Proximity to waste disposal and industrial sites | Yes | Yes |
| Housing | | |
| Overcrowding – room occupancy | Yes | No |
| Overcrowding – bedroom occupancy | No | Yes |
| Lack of Central Heating | Yes | Yes |

A more detailed description of the indicators and explanation of changes since WIMD 2011 are available in the consultation document:

<http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?status=closed&lang=en>

Full technical information will also be available in the metadata for WIMD 2014.

3 Income Domain

The income domain focuses on the proportion of people with income below a defined level.

3.1 Proposed Indicators – responses to specific consultation questions

Do you have any other comments on proposed / rejected indicators, or any additional suggestions (bearing in mind our indicator criteria)?

Of those who answered this question, all welcomed the proposal for this domain.

Small Area Income Estimates: All respondents to this question also noted a preference for small area income estimates, and agreed that the CACI Paycheck Small Area Income Estimates were not suitable for WIMD. The Office for National Statistics recently announced that they intend to publish income estimates at MSOA level (aggregations of approximately 5 LSOAs) in autumn 2014. This work will be reviewed for inclusion in future Indexes.

NASS supported asylum seekers: Two respondents disagreed with the inclusion of NASS supported asylum seekers, as location is typically concentrated due to accommodation support provided by Local Authorities. This was considered, but as asylum seekers are not eligible for other benefits in the domain, but are income deprived, we have concluded that they should be included in the domain.

We note the support for the exclusion of contribution based Job Seekers Allowance claimants. Although initial discussions indicated that this may be possible, the Department for Work and Pensions have stated that this is not possible, and we will therefore include those who are on contribution based Job Seekers Allowance, as in WIMD 2011.

Respondents agreed that providing references to DWP persistent claimants data as background information would be useful. We will take this forward.

Rural poverty was highlighted by four respondents. It was suggested that some rural areas benefit from a high employment rate, but low wages, and therefore a measure on wages should be included. It was suggested that an indicator on the cost of living including transport costs should be included in the domain. If not possible as an indicator, then it was suggested that it would provide useful background information. Two respondents suggested that benefit take-up is lower in rural areas. One respondent noted that in rural areas people are more likely to be self employed, meaning less pay and job security.

Please see Section 12, Other General, for future plans for general work on deprivation in rural areas.

Other benefits: Housing Benefit was suggested for inclusion by one respondent, as it is means tested and included in universal credit. This was discussed with the domain group who felt that it would be best to exclude until Universal Credit is rolled out across Wales. Personal Independence Payment and Carers Allowance were suggested for inclusion by another respondent. It was noted that Personal Independence Payment is not means-tested, therefore wouldn't be suitable for the domain. Whilst carers allowance does have a means tested element, it was agreed that it shouldn't be included in WIMD 2014 based on a principle of minimum change (as outlined in the consultation document).

3.2 Methodology

One respondent questioned whether this domain's indicator should be age sex standardised. On discussion, we noted that whilst age-sex standardisation is useful in some context, it would not be relevant in this context. If the domain was age sex standardised, then it would be measuring something that doesn't align with the definition of the domain, people with an income below a defined level.

One respondent noted that the student population should not be included in the denominator for the domain. We believe that using a sub-group of the population for this denominator is not appropriate, as in an area of high student population this domain could include only a very small number of people. We believe this approach is consistent with other domains.

One respondent queried whether working tax credit was included. We have amended the wording of the indicator to clarify that those in receipt of Child Tax Credits and Working Tax credits are included.

3.3 Outstanding Issues

There are no outstanding indicators for this domain.

3.4 Summary of indicators for WIMD 2014

The Income domain consists of a single composite indicator, Income deprivation, calculated from the following three elements.

(a) Percentage in receipt of income related benefits.

This indicator is formed by combined count of the yearly (Feb, May, Aug, Nov) average of Income Support (IS) claimants, Jobseekers Allowance (JSA) claimants, Pension Credit (PC) claimants, Income Based Employment and Support Allowance (ESA) claimants and the number of dependents on claimants of IS, JSA, PC, ESA, all divided by the total population. Data are compiled from the Work and Pensions Longitudinal Study (WPLS).

(b) The number of children and adults in families that are in receipt of Tax Credits and have an income which is less than 60% of the median income for Wales (Before Housing Costs)

This is the addition of people claiming the Child Tax Credit and the Adult Tax Credit. This data is sourced from HMRC.

(c) NASS-supported Asylum Seekers

The number of National Asylum Support Service (NASS) supported Asylum seekers at the end of December 2010 are also added to this indicator.

The above are counts of unique individuals (i.e. those who claim multiple benefits are only counted once). The three elements can be summed and expressed as a percentage of the total population for the LSOA.

3.5 Other indicators to consider for future

Small area income estimates
Universal credit claimants

3.6 Changes made in light of consultation responses /recent work

As a result of further discussions with data providers, this indicator will now include those on contribution based Job Seekers Allowance (JSA). This is consistent with the approach in WIMD 2011.

4 Employment Domain

The purpose of the employment domain is to capture lack of employment. This covers involuntary exclusion of the working age population from work, including those people who cannot work due to ill-health or who are unemployed but actively seeking work.

4.1 Proposed Indicators - responses to specific consultation questions

Do you have any other comments on proposed / rejected indicators, or any additional suggestions (bearing in mind our indicator criteria)?

Of the 10 that responded to this question all agreed with the proposal for the domain.

Two respondents additionally noted that they agreed with the removal of the New Deal/ Work Programme from the composite indicator.

Respondents agreed that providing references to DWP persistent claimants data as background information would be useful. One respondent noted that referencing data on workless households would also be relevant. One respondent noted that an indicator on the living wage would be appropriate for this domain. Three respondents noted that in rural areas people are more likely to be self employed, meaning less pay and job security. Three respondents suggested that benefit take-up is lower in rural areas.

Other suggested indicators included: number of job vacancies; individuals on zero hour contracts; individuals undertaking multiple jobs; self employed individuals in receipt of low incomes; and access to Job Centre Plus. One respondent suggested looking at 'under-employment' for future WIMDs.

We have considered these responses. We will reference relevant data sources as part of WIMD reports. We acknowledge comments relating to suggestions of lower benefit take-up in rural areas, but are not aware of robust evidence to support this. Other indicators e.g. zero hour contracts are not available at the small area level.

4.2 Methodology

One respondent questioned whether this domain's indicator should be age-sex standardised. On discussion, we noted that whilst age-sex standardisation is useful in some context, it would not be relevant in this context. If the domain was age-sex standardised, then it would be measuring something that doesn't align with the definition of the domain, a lack of employment within the working population.

One respondent noted that student population should not be included in the denominator for the domain. It was agreed that using a sub-group of the population for this denominator is not appropriate, as it could lead to a situation where student areas with a handful of non-students being one of the most employment deprived in Wales. It was not considered as inconsistent with other domains, for example: the employed are not eligible for unemployment benefit but are still in the denominator for the employment domain.

4.3 Outstanding Issues

There are no outstanding indicators for this domain.

4.4 Summary of indicators for WIMD 2014

The employment related benefits indicator is calculated from a count of unique individuals (i.e. those who claim multiple benefits are only counted once) entitled to:

- Incapacity benefit (replaced Severe Disablement Allowance);
- Jobseeker's Allowance (JSA); and
- Employment and Support Allowance (ESA).

The indicator is expressed as a percentage of the working age population for the LSOA.

4.5 Other indicators to consider for future

Universal credit claimants

4.6 Changes made in light of consultation responses /recent work

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

5 Health Domain

The purpose of this domain is to measure lack of good health.

5.1 Proposed Indicators - responses to specific consultation questions

Subject to adequate data developments and quality, would you agree with the proposals to include an indicator on diagnosed chronic diseases?

Nearly all respondents who answered this question supported the principle that an indicator on diagnosed chronic diseases as recorded by GP surgeries would be desirable, though several raised the question of which diseases should be included, and whether these should have proven links with deprivation. Two respondents noted the potential under-reporting of mental health related conditions, as these are not always reported to a GP. Three respondents noted the significant practical barriers to including such an indicator in WIMD 2014.

The contract for the Data Quality System (available to GP practices in Wales) has only recently been awarded. Requests to access this system have not yet been considered, and therefore we will be unable to assess the completeness, quality and accuracy of this data prior to compiling WIMD 2014.

We note the support for such an indicator, and we will continue to investigate this as a potential data source for future Indexes.

Subject to further investigation, would you agree with the inclusion of an indicator on 'proportion of unpaid carers'?

Of those that answered this question, 13 agreed (at least to some extent) that such an indicator should be included, four respondents were against or were unconvinced and two noted that there wasn't enough information in the consultation to form a judgement.

Of those that supported including an indicator on carers, some noted the health impacts on the carer, others the potential loss of income and another referred to limiting life-choices (and being deprived of time). Of those that were not in favour or were unconvinced about the inclusion of an indicator on carers, one noted that it's not a measure of population health and another noted that the ill health of carers should be picked up via other indicators. Two referred to complex social variables that invalidate its use in a comparative Index '*many people in poorer communities do not regard their familial patterns of care in ways which would be defined officially*'. Two respondents raised concerns about using an additional indicator sourced from the Census, as the indicator would not be frequently updated.

Whilst acknowledging the important work of carers, the WIMD Advisory group questioned the rationale for focusing on carers over other sub-sets of the population. They also felt that the ill-health of carers was captured through other indicators, and that we should not be introducing new Census indicators where avoidable.

We have considered the views of consultation respondents and of the WIMD Advisory group, and have concluded that it's not appropriate to include an indicator on one sub-set of the population such as carers. The ill-health of carers is captured through other indicators in the health domain.

Do you have any other comments on proposed/rejected indicators, or any additional suggestions?

Proposed Indicators

Limiting Long Term Illness (LLTI): One respondent raised concerns about the subjective nature of this indicator and suggested we should only use an indicator on diagnosed long term chronic diseases. On the other hand, another welcomed its inclusion as many individuals with a LLTI may not be in contact with their GP. One respondent asked whether those who have an illness that limits them 'a lot' be weighted higher than those limited 'a little'.

Rejected Indicators

Fuel Poverty: One suggested adding a Fuel Poverty indicator in this domain (as has a huge impact on health). Please see section on Housing domain.

Smoking: One respondent suggested looking at a smoking indicator in future (though acknowledging that there is currently no data source).

Prescribing data (Mental Health): Two respondents welcomed the potential future inclusion of prescribing data on mental health. Another expressed disappointment that no mental health indicator was currently proposed (noting that England use modelled estimates), with another suggesting that further work is needed on a potential mental health indicator.

Emergency admissions: Three respondents agreed with the rationale for not including this as a proposed indicator. One questioned the rationale for rejecting with one suggesting that *'limited access to emergency hospital services can have a significant impact on the health and wellbeing of citizens living in rural areas'* and the other noting *'that longer travel times and difficulties in accessing services promptly prejudice good health outcomes for those in need of health services'*. One of these respondents suggested than an indicator measuring time taken to access certain hospital units (e.g. A&E, maternity services, mental health etc.) should be included in the health domain. The same respondent suggested an indicator on access to non-emergency health services. This respondent also suggested a mental health inequalities indicator as this affects rural areas.

A couple noted that many people with mental health issues are not in contact with their GP. Two respondents suggested that it was unclear as to why a mental health indicator had been rejected, with one suggesting using survey data.

Childhood Obesity: Many respondents supported investigating this further in future. One noted a concern about potentially using a Childhood Obesity indicator in future (suggesting that it may not entirely be linked to deprivation).

Health life expectancy: One stressed its importance and suggested developing an indicator at LSOA level.

Maternity Indicators – one respondent supported investigating further in future.

We have considered all these responses. We will review several of these data sources for future WIMDs (see below). In terms of emergency services, the indicators within the Access to Services domain capture the time taken to access key services required for day-to-day living. These include GP surgeries and pharmacies.

5.2 Methodology

One respondent asked if we should remove age-standardisation from the health indicators, and simply look at the raw occurrences/rates. The idea behind standardising is to try to identify inequality in health outcomes, i.e. after adjusting for the overriding factor of age, is one area more prone to ill-health than another? Therefore, as this aligns with the definition of the Health domain, we will continue to use age-sex standardisation for this domain. Age-sex standardisation isn't used in other domains, but the restriction of denominators to specific age groups is applied where appropriate (e.g. qualifications).

5.3 Outstanding Issues

There are no outstanding issues for this domain.

5.4 Summary of indicators for WIMD 2014

- Cancer Incidence
- Long Term Limiting Illness
- Low Birth Weight
- All Cause Death Rate

Full details of the proposed indicators for WIMD 2014 were listed in Section 5 of the consultation document:

<http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?lang=en>

5.5 Other indicators to consider for future

- Prevalence of Diagnosed Chronic Diseases (GP Data Quality System)
- Prescribing data
- Child Obesity
- Maternity Indicators

5.6 Changes made in light of consultation responses /recent work

We note the support for an indicator on Diagnosed Chronic Diseases. For practical reasons, it is now not possible to include such an indicator in WIMD 2014, but we will continue to investigate this as a data source for future Indexes.

Whilst acknowledging the important contribution of Carers, we have concluded that it is not appropriate to include an indicator on one sub-set of the population (such as carers). The ill-health of carers is captured through other indicators in the health domain.

6 Education Domain

The purpose of this domain is to capture the extent of deprivation relating to education, training and skills. It is designed to reflect educational disadvantage within an area in terms of lack of qualifications and skills. The proposed indicators capture low attainment among children and young people and the lack of qualifications in adults.

6.1 Proposed Indicators - responses to specific consultation questions

Do you agree with proposals to drop Key Stage 3 Average Points Score?

Of those who answered to this question, all welcomed this proposal and agreed with the rationale.

Do you agree with proposals for two Key Stage 4 attainment indicators?

Of those who answered this question, nearly all welcomed the proposal and agreed with the rationale. One respondent questioned the proposal to change to 'capped' points score, suggesting that *"schools in more deprived areas are more likely to enter pupils for fewer qualifications...."*

What are your views on changing the Overall Absenteeism indicator to one based on repeat absentees?

Of those who answered to this question, all welcomed this proposal and agreed with the rationale.

Do you have any other comments on proposed/rejected indicators, or any additional suggestions?

Early Years Assessments and National Tests: Eight respondents agreed with our intention to keep Early Years and/or National Test indicators under review for future.

Not in Education, Employment or Training (NEET): Four respondents suggested that an indicator on young people that are NEET should be included (a few suggesting that this would be better than the HE indicator) or developed for future Indexes.

HE Indicator: A few questioned the inclusion of the HE indicator as this is only part of the picture (eg given the increase in the number of apprenticeships).

Some respondents suggested other indicators such as 'numerical literacy in adults', adults with level 4 qualifications and adults attaining qualifications from tertiary education.

We have considered the responses and will review data on Early Years and National Tests for future Indexes. We agree that NEET would be a better indicator than participation in Higher Education, however it is currently not possible to measure NEET at LSOA level. We will continue to investigate alternative indicators on progress to training and further education for future WIMDs

6.2 Methodology

No comments were received.

6.3 Outstanding Issues

There are no outstanding issues for this domain.

6.4 Summary of indicators for WIMD 2014

- Key Stage 2 Average Points Score
- Key Stage 4 Capped Points Score
- Key Stage 2 Level 2 Inclusive
- Repeat Absenteeism Rate
- Proportion of people not entering HE aged 18-19
- Proportion of adults (aged 25-64) with no qualifications

Full details of the proposed indicators for WIMD 2014 were listed in Section 5 of the consultation document:

<http://wales.gov.uk/consultations/statistics/proposed-indicators-wimd-2014/?lang=en>

6.5 Other indicators to consider for future

- Early Years Indicators
- National Tests
- Progress to training or further education

6.6 Changes made in light of consultation responses /recent work

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

7 Access to Services Domain

The purpose of this domain is to capture deprivation as a result of a household's inability to access a range of services considered necessary for day-to-day living. This covers both material¹ deprivation (for example not being able to get food) and social² aspects of deprivation (for example not being able to attend afterschool activities).

The WIMD 2011 measure of the access to services domain was not, like the other seven domains, a direct measure of deprivation that can be used on its own; rather it was a contributory factor that becomes important as an aspect of multiple deprivation. That is, poor access to services is a factor which can compound other types of deprivation that exist in an area. By taking private transport into account, alongside public transport for WIMD 2014, we are confident that this domain is an improved measure of an area's access to services required for day to day living.

7.1 Proposed Indicators - responses to specific consultation questions

Do you agree with the changes, additions to and exclusions from the proposed list of services for WIMD 2014?

Of those that responded, all supported the inclusion of Pharmacies and Petrol stations.

We proposed to remove Dentists and Transport Nodes from the list of services for WIMD 2014 as they were not considered to be essential for day-to-day living.

Dentists: The majority supported the removal of dentists (six for, three against). Of those against, two were due to rurality, and one was due to the link between dental caries and poverty.

Transport nodes: The majority supported the removal of Transport nodes (six for, one against). The respondent against was uncertain of the impact for rural areas.

Two respondents noted that the data used to weight the indicator, and the weights should be published. We agree with these suggestions – full details of the methods used will be published in the technical report.

Weighting: One respondent noted that weights for each service were not mentioned. These are not standard weights, and will be calculated using the output from the factor analysis methodology. Values will also be published alongside the technical report.

One respondent noted that maps of the travel times would be useful and that the ability to change the day and time would be useful.

One respondent noted that there was insufficient information, and noted that Access to Services shouldn't be treated as a contributory factor to deprivation.

¹ Material deprivation is having insufficient physical resources - food, shelter, and clothing – necessary to sustain a certain standard of life.

² Social deprivation refers to the ability of an individual to participate in the normal social life of the community.

Digital services were highlighted by several responses (five) as an indicator that should be included in this domain. We have recently explored the suitability of Ofcom data for an indicator on digital inclusion, and found that the data may be a suitable source for fixed line broadband data. We will continue to review potential indicators in combination with 'not spots' data, and if a suitable indicator can be calculated we will include it within the Access to Services domain.

Access to: tertiary education; A&E services; Welsh Medium Schools and Culture and Heritage sites were also suggested as indicators.

There was also a suggestion to include playing fields in the leisure centre indicator. We are currently in discussions with Sport Wales to determine what data is available.

7.2 Methodology

Two questions were included in the consultation to discuss the methodology for this domain.

Do you agree with proposals for combining public and private transport?

Seven of the twelve respondents who answered this question were supportive of the proposals for combining public and private transport. Three of the five respondents that were against proposals noted that car ownership was not a sign of affluence; the other two would prefer separate subdomains for private and public transport.

We agree that car ownership is not a sign of affluence, and note that car ownership will be used as a weighting mechanism, to allow for the differences in methods of transport in different areas across Wales. A paper on the methodology agreed for calculating the Access to Services domain, including a discussion on separate domains for public and private transport, can be found at:

<http://wales.gov.uk/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>

What are your views on the selected calculation of travel times method?

Two respondents noted support for simpler and less [time] consuming methods. One respondent noted that the method should encompass the majority of travel routes.

One respondent noted that Census values do not adequately represent the vulnerable people who are prevented for many reasons from using their household's car. One respondent noted that frequency and timing of public transport was not taken into account by this measure.

7.3 Outstanding Issues

There are no outstanding issues for this domain

7.4 Summary of indicators for WIMD 2014

Average travel time by public and private transport to a food shop;
Average travel time by public and private transport to a GP surgery;
Average travel time by public and private transport to a primary school;
Average travel time by public and private transport to a secondary school;
Average travel time by public and private transport to a post office;
Average travel time by public and private transport to a public library;
Average travel time by public and private transport to a leisure centre;
Average travel time by public and private transport to a pharmacy; and
Average travel time by private transport to a petrol station.

7.5 Other indicators to consider for future

Digital inclusion

7.6 Changes made in light of consultation responses / recent work

We have investigated the use of 2011 Census data on car ownership to weight the average road travel times together with average public transport travel times. We commissioned a household level data table from the 2011 Census (at LSOA level) - number of cars in household by number of people aged 17 and over in household. We subsequently looked at three options for weighting public and private transport travel times. The selected method estimates the number of adults that have access to a car based on the number of adults and cars within the household. A paper on the methodology agreed for calculating the Access to Services domain can be found at:

<http://wales.gov.uk/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>

We have recently explored the suitability of Ofcom data for an indicator on digital inclusion, and found that the data may be a suitable source for fixed line broadband data. We will continue to review potential indicators in combination with 'not spots' data, and if a suitable indicator can be calculated we will include it within the Access to Services domain.

8 Community Safety Domain

This domain is intended to consider deprivation relating to living in a safe community. It covers actual experience of crime and fire, as well as perceptions of safety whilst out and about in the local area.

8.1 Proposed Indicators - responses to specific consultation questions

Do you agree with the preferred approach of including anti-social behaviour incidents (if data are robust) with the alternative being use of offender location data (as for WIMD 2011)?

Of those that responded to this question, most (12) agreed that the indicator should be included, three were not supportive of the indicator.

Four of those that supported an anti-social behaviour indicator noted that it would have to be of sufficient quality to be included. Many highlighted advantages over the Youth and Adult Offenders noting that *'multiple offences from individual offenders could be included'*, and *'offender data only covers crimes that have been cleared up'*.

Those that were not in support of the indicator noted it is likely that the ASB incidents are under reported in areas that most frequently experience it, as there may be a tolerance towards it. Similarly, in areas where there are low levels of crime, there may be high levels of reporting.

We have noted the support for the indicator, and are currently reviewing the dataset in order to establish if it is of sufficient quality to include in WIMD 2014. If the dataset is judged to be of suitable quality, it will be used in WIMD 2014. If the dataset is not of sufficient quality the youth and adult offenders indicators, as used in WIMD 2011, will be used in its place.

What are your views on the use of road accidents as a new indicator, assuming number of pedestrian and cyclist casualties are not robust enough for WIMD?

Most (nine) respondents agreed that the indicator should be included, although three respondents were not supportive of the indicator. An additional three respondents were unsure, noting that they were not sure whether it would be appropriate to include all vehicles. Having reviewed the data we do not feel that it is an appropriate indicator for a small area measure of deprivation. This is due to motor vehicle accident casualties' data being extremely volatile at a small area level.

We have also investigated whether an indicator on pedestrian and cyclist casualties only would be suitable, but concluded that the data has insufficient values at a small area level to enable an appropriate indicator.

A paper summarising work on a potential road traffic accident indicator will shortly be published at:

<http://wales.gov.uk/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>

Do you have any other comments on proposed / rejected indicators, or any additional suggestions (bearing in mind our indicator criteria)?

One respondent agreed with the inclusion of all fire incidents, no comments were provided against this proposal.

One respondent requested further guidance on the violent crime indicator. They noted that there may be a different interpretation of the data in non residential town/ city centres due to violence associated with the night time economy.

One respondent approved of the inclusion of racially and religiously aggravated offences, and noted that data on further hate crimes should be included if available. We discussed with members of the domain group and note that further hate crimes would be recorded by the type of the crime, and thus included in the domain. An example of this could be a homicide due to sexual orientation; this would be recorded as a homicide.

One respondent noted that survey data could provide data on perception of safety. We will consider providing references to data from the Crime Survey for England and Wales as background information.

One respondent noted the UKSA report on the quality of Recorded Crime Statistics³. We acknowledge, and are monitoring further reviews and audits of crime data. We also note that this is the best data source available for small area crime data.

8.2 Methodology

No comments were received on the methodology for this domain.

8.3 Outstanding Issues

We intend to include an indicator on anti social behaviour in WIMD 2014, if:

- a) On collection of the 2013/14 data, it is deemed to be comparable with the 2012/13 data; and
- b) Data quality is deemed to be sufficient.

This indicator would replace the Adult and Youth offender indicators which was included in WIMD 2011.

As part of our recent work, the WIMD team is in the process of reviewing the denominators for the Police recorded theft, criminal damage and violent crime indicators. At present, the denominator includes the usually resident population plus the non-resident working population. We propose to remove the non-resident working population from this denominator.

The non-resident working population is a commissioned table from the Census; therefore it is not regularly updated. From the 2001 Census this figure was approximately 911,000. This considerably increases the figure for the population of Wales and also approximately a third of the Welsh population to be double counted.

³ <http://www.ons.gov.uk/ons/rel/crime-stats/crime-statistics/period-ending-september-2013/sty-uksa-assessment.html>

We will be investigating the impact of removing this part of the denominator before making a final decision for WIMD 2014.

8.4 Summary of indicators for WIMD 2014

Police recorded burglary;

Police recorded criminal damage;

Police recorded theft;

Police recorded violent crime;

Fire incidences; and

Either:

a) Anti-Social Behaviour; or

b) Percentage of adult offenders and Percentage of youth offenders

8.5 Other indicators to consider for future

None.

8.6 Changes made in light of consultation responses /recent work

We note the support for an indicator on Anti Social Behaviour. We have carried out some initial analysis of the suitability of Anti Social Behaviour data, and we will look to include in WIMD 2014 if updated data received over the summer is suitable.

9 Physical Environment Domain

The purpose of this domain is to measure factors in the local area that may impact on the wellbeing or quality of life of those living in an area.

9.1 Proposed Indicators - responses to specific consultation questions

Do you have any other comments on proposed/rejected indicators, or any additional suggestions?

Most respondents noted they were satisfied with the proposed indicators for this domain. One suggested removing this domain as the proposed indicators are not effective measures of deprivation. Two respondents suggested that a flooding indicator should not be included as a measure of deprivation. Two respondents suggested that air quality is not an effective measure of deprivation.

One respondent raised concerns that air pollution can vary significantly from year to year, and referenced real time data. This issue was followed-up through correspondence with the data providers, and we concluded that the proposed indicators are the most appropriate indicators for WIMD. Within WIMD reports we will provide links to additional information on air quality (including real-time) indicators.

Green spaces: A few respondents welcomed proposals to include an indicator when data becomes available in future. Two suggested the importance of looking at access, not proximity, to green spaces (green spaces frequently not accessible) in future.

Other indicators suggested were level of recreational open space, heat-wave disadvantage, positive landscape indicators and access to a local municipal waste site.

We have considered the above responses. We agree with the majority of respondents who were satisfied that the proposed indicators are appropriate for measuring physical environment deprivation.

9.2 Methodology

A couple of detailed, technical questions were raised. A response has been provided directly to the respondent. These questions did not affect the overall methodology.

9.3 Outstanding Issues

We are in the process of agreeing new weights that will be used to combine the four flood risk categories information into one indicator

9.4 Summary of indicators for WIMD 2014

- Households at risk of flooding score
- Estimated Air Quality (made up of two indicators Air Concentrations score and Air Emissions score)
- Proximity to waste disposal and industrial sites score

9.5 Other indicators to consider for future

- Proximity to a Natural Green Space
- Surface Water Flood Risk

9.6 Changes made in light of consultation responses /recent work

We note the support for this domain's proposals; therefore no changes were made as a result of the consultation and the proposals put forward in the consultation will be implemented.

10 Housing Domain

Conceptually, the purpose of a housing domain is to capture deprivation through lack of adequate housing, in terms of housing physical condition, living conditions and availability.

However, the lack of appropriate data means that it is not possible to fully measure housing deprivation according to this definition.

10.1 Proposed Indicators - responses to specific consultation questions

Energy Performance Certificate (EPC) Data – Update

In the consultation document, we noted that our preferred option would be to use Standard Assessment Procedure (SAP) ratings from EPC data as a broad proxy for Housing quality. If issues around accessing data can be resolved, the Welsh Government will be assessing EPC data, in terms of coverage, consistency and quality. However this work will not be completed in time to feed into WIMD 2014.

Is it appropriate for this domain to contain only one (overcrowding) indicator if that is all that is available?

Most respondents acknowledged the continuing significant challenges with this domain and suggested that the lack of reliable data should be a major concern for the Welsh Government. Numerous respondents suggested that we should be developing indicators at the LSOA level on a wide range of indicators noted in the consultation document - including homelessness, affordability, quality etc. Another noted disappointment that there has been no change since 2008.

Many noted the need for a Housing Survey. Having undertaken some work to consider what gaps exist in the evidence about housing conditions, the Welsh Government is now taking forward a short project to carefully consider the options for filling those gaps. This will include looking at effectiveness of using existing data, for instance on energy efficiency, and options for gathering data through some form of survey. This may increase the prospect of further options being available for the housing domain of WIMD in future.

Five respondents stated that they would prefer to keep the domain with just one indicator (though raised serious concerns about lack of data) because of the importance of housing when measuring poverty and other types of deprivation. One suggested lowering the weight of the domain.

Four respondents were against keeping the domain with one indicator. Two suggested that it's not appropriate for a domain to only include one indicator – particularly if this doesn't cover all aspects of the domain. One suggested excluding this domain until better indicators are available. This respondent suggested developing indicators on: Housing Physical condition (modelled from latest housing survey, local House Condition Surveys and other available data), living conditions (from Hard to Heat homes data – HEED), homelessness and affordability.

Many respondents did not explicitly say whether they felt that the domain should be kept with one indicator, but all raised concerns about the general lack of data. For example, one respondent noted the lack of appropriate data, and made numerous suggestions for indicators (e.g. privately rented housing, houses in multiple occupation, housing waiting lists, house price indices), though noting the difficulty in developing appropriate small-area

measurable indicators for WIMD. He suggested further research and debate before discounting the domain (and exploring linking data further).

Do you have any other comments on proposed/rejected indicators, or any additional suggestions?

Overcrowding: Of those who commented, all were happy with moving from a 'rooms' to a bedrooms measure. Concerns were noted that the overcrowding indicator is based on 2011 Census data, and will not be updatable (particularly as issues relating to 'bedroom tax' will mean that overcrowding may become more of an issue in future years).

Central Heating: Several respondents agreed that central heating should be dropped. One respondent noted the rationale for proposing to drop central heating, but preferred to retain the indicator until further indicators are developed. This view was shared by a member of the advisory group.

Fuel poverty: several respondents suggested its inclusion and were disappointed that it was not proposed for inclusion (no data available at LSOA level, and there are close links with income domain). Three suggested that this was particularly important in the rural context with many households not connected to mains gas. They referenced research work which suggested that households dependent on oil or solid fuel have a relatively higher likelihood of being in fuel poverty. One of these suggested that we use 2011 Census data on type of central heating as a proxy for this. Another suggested using data on those off mains gas.

SAP ratings: Several respondents would support its inclusion, whilst others questioned it. One local authority currently uses SAP ratings to measure housing quality and would support its inclusion if suitable. Another questioned its use – due to limitations (coverage etc.). Another two suggested that a low SAP rating does not imply deprivation.

Housing affordability: Two disagreed with our conclusion that this was an inappropriate indicator and suggested that we develop a suitable indicator (and others suggested its importance). They felt that this was a particular issue in rural areas. Several respondents asked whether we could use same method as English IMD on Housing Affordability (modelled from surveys).

We have considered the above responses. As stated in the consultation document, we do not consider Housing Affordability to be an appropriate small area measure. The suitability of energy efficiency information will be assessed for the next WIMD.

As a result of comments made in response to the consultation, we have recently undertaken work to assess the suitability of an off-gas indicator. Having reviewed the evidence we are unconvinced that an indicator on off-gas is an appropriate measure of housing deprivation. Although off-gas properties are likely to have less choice in terms of heating this is not necessarily true. Detached houses and flats are less likely to have gas central heating than other types of properties. In particular, it would not be appropriate to count many people living in modern purpose-built blocks of flats (which are off-gas) as being housing deprived. There are also practical limitations with the data sources reviewed (e.g. based on active meters). A paper summarising work on this potential indicator can be found at:

<http://wales.gov.uk/statistics-and-research/welsh-index-multiple-deprivation/?lang=en>

We agree with several respondents that an indicator on lack of central heating is not a strong indicator; however we have also taken on board the significant concerns raised about this domain and the lack of data on housing deprivation. We do not think it appropriate that the Housing domain include only one indicator (overcrowding), and we do not think it appropriate to remove the housing domain from WIMD nor reduce its weight (from 5 per cent). We therefore propose to include an indicator on 'Proportion of people in households without central heating', (as used in earlier WIMDs) as a proxy for housing quality, whilst recognising that it is not as strong an indicator as we would wish for if other data were available.

10.2 Methodology

No comments were received.

10.3 Outstanding Issues

There are no outstanding issues for this domain.

10.4 Summary of indicators for WIMD 2014

- Proportion of people living in overcrowded households (bedrooms measure)
- Proportion of people living in households with no central heating

10.5 Other indicators to consider for future

- Energy Performance Certificate information
- Homelessness
- Housing quality (modelled from any future housing condition survey if available)

10.6 Changes made in light of consultation responses /recent work

We note the significant concerns raised about this domain and the lack of data on housing deprivation. We also note that several respondents agreed that an indicator on central heating should be dropped. In light of a couple of consultation responses, we explored the possibility of including an off-gas indicator but concluded that this was not suitable (see section 10).

We agree that an indicator on lack of central heating is not a strong indicator of housing deprivation. However we do not think it appropriate that the Housing domain include only one indicator (overcrowding). We will therefore include an indicator on 'Proportion of people in households without central heating', (as used in earlier WIMDs) as a proxy for housing quality. In recognition of the fact that lack of central heating is becoming an increasingly poor indicator of housing quality over time, we propose to lower its weight within the domain to 1/3 (with the overcrowding indicator assigned a 2/3 weighting).

11 Child Index and other potential Indexes

11.1 Responses to consultation

Please describe your uses of the Child Index in its current format.

Five respondents noted that they had used the Child Index. Examples mentioned were:

- Contextual information in the Childcare Sufficiency Assessment, submitted to the Welsh Government every 3 years (Carmarthenshire County Council);
- Dataset in Health of Children and Young People publication (Public Health Wales);
- As a check on family poverty (Centre for Regeneration Excellence Wales);
- Contextual information in the Director of Public Health Annual Report (Powys Teaching Health Board); and
- Area profiling (City & County of Swansea).

Those that didn't use the Index cited the following reasons.

- Methodology - areas do not have the same number of children. Therefore, it is likely that an area with more deprived children, in terms of numbers, may be ranked below an area with a higher proportion of deprived children.
- The main Index covers most bases.

In the longer term, should analyses of underlying WIMD data be prioritised over producing a Child Index in its current form?

Of the 13 respondents that answered this question, nearly all noted a preference for further work on the WIMD indicator data (including age and sex splits). One respondent noted a preference for further work on rural analysis.

Of those that supported the publication of the child Index, one respondent noted a concern that they may struggle to measure impacts and outcomes due to Child Poverty, and noted the Child & Families (Wales) Measure, 2010.

11.2 Changes made in light of consultation responses /recent work

No changes made.

12 Other general

12.1 Responses to consultation

Respondents were given an opportunity to provide general comments on WIMD. A summary of the general points are provided below.

Rurality

Around ten respondents raised the issue of rurality in some form, though not all the comments were confined to the calculation of WIMD. Some referred more generally to measures of rural deprivation.

Some respondents suggested that the Index does not *“adequately reflect the situation in respect of deprivation in rural areas”* and *“We understand this is a complex issue where LSOA data may not be available, but we don’t think that rural deprivation is captured, or weighted in this index at present”* It is not always clear what respondents mean by ‘rural deprivation’.

Some suggested the need to better reflect ‘rural deprivation’ within the existing WIMD, with a few suggesting that the Access to Services domain alone is not sufficient for this purpose. These respondents noted that *“living costs are higher in rural areas”*—this affects both basic necessities and transport (plus infrequent public transport provision), *‘car is a necessity rather than a luxury’* etc.

The following suggestions were made:

- within the Access to Services domain there should be an attempt to include data that captures the cost of living differential
- Provide sub-ranks of urban and rural areas to enable better comparisons between areas of similar characteristics
- Increase weighting of Access to Services domain
- Better consideration to household income/low income in income domain (rather than just benefit entitlement)
- Consider effects of under-employment
- Consider type of central heating and energy efficiency in Housing domain
- Including rural-specific indicators (e.g. unfit housing, under-employment, mental ill-health, lack of access to employment etc. in future Indexes)
- One respondent suggested that benefit take-up is lower in rural areas
- One suggested *“it may be that a different system is needed altogether for measuring rural poverty/deprivation”*
- A few respondents mentioned digital inclusion

These suggestions were considered during the process of developing proposals for WIMD, and during recent discussions. Where relevant, comments have been made within sections 3-10.

Some of the concerns expressed related to the way WIMD is used. A few respondents acknowledged the unsuitability of WIMD to measure rural deprivation. One noted the danger that *‘WIMD has come to be thought of by many programmes within and outside WG agencies as the one and only measure of deprivation, extending its use beyond its*

original purpose. It is important therefore, that some measure of rural deprivation be developed which is given equal regard by policy makers’.

with another noting

“The WIMD notes the limitations of the current approach and cautions against making wider assumptions, for example that not all deprived people live in the most deprived areas. However it remains a fact that the use of WIMD to develop specific policy interventions designed to tackle deprivation, such as the Welsh Government’s Communities First programme, can result in communities where the population is more dispersed potentially missing out on the benefits of such interventions”

One respondent welcomed the publication of indicator data by the rural-urban classification. A few welcomed proposals to address the limitations of WIMD in relation to rural deprivation by analysing the underlying data.

We have considered the numerous comments made relating to ‘rural deprivation’. As noted in the consultation document, deprived people in rural areas tend to be more geographically dispersed than in urban areas. Therefore, pockets of deprivation in rural areas tend to be on a considerably smaller scale than even the small scale geography at which WIMD is produced. We will ensure that this is clearly explained in the WIMD guidance and communication documentation.

We propose to address some of the issues raised in the consultation by publishing a statistical article as part of the WIMD publication package providing guidance on how WIMD and its indicators can and can’t be used to analyse deprivation in rural areas. This article will:

- Discuss definitions for urban/rural and ‘deprivation in rural areas’.
- Provide guidance on how WIMD and its individual indicators can be used to analyse deprivation in rural areas, whilst also stating the limitations
- Explain and reference the data on WIMD and its individual indicators that has been published by settlement type (including rural and urban)
- Include examples of how WIMD indicator data can be analysed to consider deprivation in rural/urban areas (include analysis for a small number of WIMD indicators as examples)
- Reference other useful data sets and analysis.

This article will be published as part of the WIMD publication package and will be published within a week of the main WIMD publication.

Uses of WIMD

Targeting resources: Two respondents raised concerns about the regular mis-use of the Index to allocate funding. The respondents suggested clearly communicating the purpose of WIMD and when it is appropriate to use. Our published guidance is intended to provide this advice.

Another respondent suggested that we should look at individuals that are multiply deprived rather than areas of multiple deprivation. This is something we are currently working towards, and see as a key development for the future.

Older People: One respondent suggested producing an Index – or at least indicators – for older people. Another noted that an Older Persons Index would be of most value if it could incorporate additional indicators relevant to older people.

Reliance on Census data: One respondent suggested that Census data isn't updated frequently and will shortly be out of date. He suggested not relying on any Census data in future WIMDs.

Protected Groups: One respondent suggested developing indicator data in relation to protected characteristics groups.

12.2 Changes made in light of consultation responses /recent work

We propose to address some of the issues raised in the consultation by publishing a statistical article as part of the WIMD publication package providing guidance on how WIMD and its indicators can and can't be used to analyse deprivation in rural areas.

We will continue to prepare comprehensive guidance more generally on how the WIMD can be used and any limitations.

Annex A – Organisations responding to WIMD consultation

Bridgend County Borough Council
Caerphilly County Borough Council
Carers Wales
Carmarthenshire County Council
Centre for Regeneration Excellence Wales
Ceredigion County Council
Chwarae Teg
Citizens Advice Cymru
City & County of Swansea
Conwy County Borough Council
Cyngor Gwynedd
Diverse Cymru
Hywel Dda University Health Board
Isle of Anglesey County Council
Natural Resources Wales
Pembrokeshire County Council
Powys Association of Voluntary Organisations/Pembrokeshire Association of Voluntary Services
Powys County Council
Powys Teaching Health Board
Public Health Wales NHS Trust
Rhondda Cynon Taf County Borough Council
Royal College of Nursing in Wales
SportWales
The Network – tackling social exclusion in libraries, museums, archives and galleries
Torfaen County Borough Council
Undeb Cenedlaethol Athrawon Cymru (UCAC)
Wales Fuel Poverty Charter Coalition
Welsh Language Commissioner

and one individual response