

# Glasgow City Council Internal Audit Section

## Committee Summary

Item 6(c)

19th November 2025

## Neighbourhoods, Regeneration and Sustainability– Empty Homes Process

### 1 Introduction

- 1.1 As part of the agreed Internal Audit plan, we have carried out a review of the empty homes process within Neighbourhoods, Regeneration and Sustainability (NRS).
- 1.2 A long-term empty home is a privately owned property that has remained unoccupied for six months or more. These homes represent a significant underused asset that could help meet local housing demand. When left vacant, they can deteriorate, become visually unappealing, and attract vandalism or anti-social behaviour, negatively impacting the surrounding community. Returning empty homes to use not only increases the available housing stock — providing essential accommodation for individuals and families — but also supports efforts to reduce homelessness and revitalise neighbourhoods, as well as making a positive contribution towards the Council's response to the Housing Emergency, declared in November 2023.
- 1.3 While the upkeep and maintenance of a property is ultimately the responsibility of the homeowner, the local authority can offer guidance and support. By working collaboratively with partners in the housing sector, the Council can help facilitate the return of empty homes to residential use. An empty homes team has been established within the Council for the management and monitoring of empty homes.
- 1.4 Whilst there are no external legislative / statutory responsibilities that the Council must comply with in terms of empty homes, the Council does have the power to apply a council tax premium on homes that have been empty for a period of 12 months under Council Tax legislation. The Council can also consider taking Compulsory Purchase Order (CPO) action where they apply to legally transfer ownership of the property to the Council.
- 1.5 The purpose of this audit was to gain assurance that there are adequate controls in place within the empty homes process and that these are operating effectively.
- 1.6 The scope of the audit included a review of controls in the following areas:
  - Governance and strategy
  - Roles and responsibilities
  - Partnership working
  - Case management and owner engagement
  - Monitoring and management of empty properties
  - Performance monitoring and reporting
  - Approvals and escalation
  - Risk management

1.7 The review did not include any assessment on the efficacy of the decisions made.

## 2 Audit Opinion

2.1 Based on the audit work carried out a **reasonable** level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and **four** recommendations which management should address.

## 3 Main Findings

3.1 We are pleased to report that the main key controls are in place and generally operating effectively. In May 2023, the Economy, Housing, Transport and Regeneration City Policy Committee (the Committee) agreed that actions in relation to Empty Homes would be integrated through the 2023-2028 Local Housing Strategy (the Strategy). The Strategy sets out the key aims in relation to empty homes and an annual update on progress towards these aims is reported to the Committee.

3.2 A dedicated email address, website and phone number have been set up to assist members of the public, external organisations and Council staff in reporting empty homes. Further guidance on the empty homes process, the Council Tax premium process and support available to homeowners is also included on the Council website.

3.3 Support and incentives provided to the owner of the empty homes are generally targeted depending on the circumstances causing the property to be empty; this is primarily through the provision of guidance and signposting homeowners to relevant services for example building control and property sales advice. The empty homes team also work in partnership with Registered Social Landlords (RSLs) and the Social Work Homelessness team to help identify empty properties and opportunities for bringing these back into use.

3.4 A database is used to monitor and manage empty homes. As at June 2025, 9,051 empty homes were logged; 4,980 closed or brought back into use, and 4,071 still under monitoring, of which 2,700 live cases are being actively managed. The database is updated as new information becomes available, with notes added to provide supporting details. Individual case records are also maintained to capture more detailed notes on the ongoing review and follow up of properties.

3.5 Bespoke reports are generated to facilitate detailed analysis and review of specific areas; for example, to review cases where occupation is legally prohibited or where remedial work is being undertaken to mitigate a wider public risk. Performance information reported monthly to NRS management provides a breakdown of empty homes data with a small number of statistics also reported to senior management (monthly) and Committee (annually).

3.6 The Council Tax empty homes premium will be automatically applied once the property is empty for a period of 12 months. Exemptions are available and can be applied following a successful application from the homeowner. The empty homes team will provide additional information on the reasons for the property being empty to the Council Tax team, to ensure that premiums are correctly applied. We reviewed 15 cases where the property was liable and found that the premium charge and/or exemption had been correctly applied in all cases.

3.7 Arrangements for CPOs are clearly documented and formal approval by the Council's Contracts and Property Committee and the Scottish Government is required. Appropriate arrangements had been followed for the five CPO cases that we reviewed.

3.8 However, we did identify some areas for improvement. Some documented guidance had been developed in support of the processes; however, this does not fully cover all the process in place, and the roles and responsibilities of those involved.

3.9 Although we were advised that the database is subject to monthly review and discussion, details of the discussions held and/or identified actions are not recorded. The database does not currently reflect last or next review dates, limiting oversight of overdue or stalled cases that may need escalation. The database, which is held on EDRMS with access limited to the empty homes team, also contained some minor data inaccuracies. Escalation arrangements have not been agreed.

3.10 From our sample testing we found that initial engagement with homeowners was not consistently being undertaken in line with agreed procedures. Whilst a process has been established for sending initial communications to the homeowners of empty properties, there is no framework for the ongoing review and monitoring of cases which has led to delays in following up cases. An increase in empty home referrals and resource issues within the team have led to a backlog which is impacting these processes. Additionally, staff errors and issues with the accessibility of case evidence (e.g. failing to store data centrally) to demonstrate engagement were also found.

3.11 An action plan is provided at section four outlining our observations, risks and recommendations. We have made four recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	0
Medium	Less critically important controls absent, not being operated as designed or could be improved.	4
Low	Lower-level controls absent, not being operated as designed or could be improved.	0
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	0

3.12 The audit has been undertaken in accordance with the relevant internal audit standards.

3.13 We would like to thank officers involved in this audit for their cooperation and assistance.

3.14 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

## 4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Roles and responsibilities have been clearly documented.				
1	<p>Although some documentation has been developed to provide guidance on the management of empty homes, these do not sufficiently detail all the processes in place and the roles and responsibilities of those involved.</p> <p>Without sufficient and up to date guidance, there is an increased risk that sufficient detailed information is not being made available to empty homes staff, and the correct processes may not be understood or followed.</p>	<p>Management should review and update the documented guidance documents to ensure that they fully reflect the arrangements in place, including:</p> <ul style="list-style-type: none"> <li>processes followed for the management of empty homes,</li> <li>review process, and</li> <li>roles and responsibilities of those involved in the process.</li> </ul>	Medium	<p><b>Response:</b> Accepted</p> <p>The recommendation has been accepted, and our procedures document is now being updated in response to the findings.</p> <p><b>Officer Responsible for Implementation:</b> Group Manager (Private Sector Housing)</p> <p><b>Timescales for Implementation:</b> 30 November 2025</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Initial owner engagement is being undertaken in line with agreed procedures.				
2	<p>The documented procedures state that once initial engagement with homeowners has taken place, a secondary letter /email should be issued four weeks later if no response has been received. Current procedures do not specify a timeframe for first engagement.</p> <p>We selected an initial sample of five cases where ownership details had not been established. Appropriate efforts had been made to identify and engage with the owner in four cases. However, we found one case where a second letter was not sent following an undelivered email as there had been no process to follow such cases up. This has now been addressed by the team.</p> <p>A further sample of 15 live/ongoing cases were reviewed to assess compliance with the initial engagement procedures, and 5 cases were found where initial contact with the homeowner was not carried out in line with these agreed procedures. These included:</p> <ul style="list-style-type: none"> <li>1 case where a second follow-up engagement was not issued within the expected four-week timeframe. We were advised that this was due to a</li> </ul>	<p>Management should:</p> <ul style="list-style-type: none"> <li>Agree and implement suitable timelines for the issue of the first and second contact correspondence, taking account of the number of empty properties being managed.</li> <li>Ensure that all correspondence relating to empty homes is stored centrally and documented procedures are updated to reflect this. Periodic spot checks should be undertaken to confirm compliance.</li> <li>Continue to monitor the backlog of cases to ensure that they are subject to appropriate and timely follow up action.</li> </ul>	Medium	<p><b>Response:</b> Accepted</p> <p>The recommendation has been accepted, and procedural updates have now commenced. Several of the reviewed cases occurred during the COVID-19 period where restricted access to laptops impacted the update of records. This issue has been addressed and should not recur in the future. Similarly, procedures are being put in place to ensure that backlogs are now being closely monitored.</p> <p><b>Officer Responsible for Implementation:</b> Group Manager (Private Sector Housing)</p> <p><b>Timescales for Implementation:</b> 30 November 2025</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
	<p>high volume of cases being referred and managed.</p> <ul style="list-style-type: none"> <li>• 3 cases where supporting evidence of the engagement could not be provided as it had not been retained in a central file.</li> <li>• 1 case where staff oversight had led to no engagement taking place with the homeowner.</li> </ul> <p>In 7 of the 15 cases, we also identified significant delays (ranging from two to seven years) prior to initial contact being made. Management advised that a rise in referral volumes had resulted in a backlog of cases, which are now being actively followed up. This has impacted the expected level of engagement and has created difficulties in meeting agreed timescales. The team has already begun work to revise the expected timelines for initial engagement to reflect the current circumstances.</p> <p>Delays in initial engagement increase the risk that early opportunities are missed and empty homes are not brought back into use at the earliest opportunity.</p>			

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Empty home cases are subject to appropriate management oversight and monitoring.				
3	<p>The empty homes manager and empty homes officers review and discuss cases from the database at monthly meetings to highlight issues and discuss next steps. However, evidence of this review process and actions identified from the discussions are not recorded.</p> <p>The database used to monitor the empty homes does not record the date of the next expected, or last follow up, making it difficult for officers to easily identify cases where delays in follow up were planned and those where follow up action is required or overdue. The database also contained some minor data inaccuracies where two cases had the incorrect date / status recorded.</p> <p>Escalation arrangements expected to be followed have not been documented to clarify the circumstances in which cases should be escalated and the arrangements to be followed.</p> <p>There is an increased risk that effective review and monitoring of empty homes is not being undertaken, escalation of issues is not taking place where required and homes are not being brought back into use at the earliest opportunity.</p>	<p>Management should:</p> <ul style="list-style-type: none"> <li>Ensure that key actions arising from the review and discussion of the database are appropriately documented and regularly reviewed and updated.</li> <li>Update the database to capture dates of last and next expected follow up.</li> <li>Implement a process for the periodic validation of data held on the database to ensure accuracy and reliability.</li> <li>Agree and document the escalation arrangements expected to be followed.</li> </ul>	Medium	<p><b>Response:</b> Accepted</p> <p>The recommendation has been accepted, and procedural updates have now commenced.</p> <p>Escalation is only required where further action is deemed necessary which would not apply to most cases. Such instances are typically identified and discussed during regular team meetings and will now be specified within our procedures going forward.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Group Manager (Private Sector Housing)</p> <p><b>Timescales for Implementation:</b></p> <p>30 November 2025</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Cases are subject to appropriate ongoing review and monitoring with effective communication being maintained with empty homeowners.				
4	<p>The process to be followed for the ongoing review, engagement and follow up of empty homes has not been agreed or documented.</p> <p>We reviewed a sample of 25 cases (15 live, 5 dormant and 5 that had been brought back into use) where it would be appropriate for ongoing review and follow up engagement to have taken or taking place and found that 16 were not being reviewed at expected intervals and significant time gaps had arisen between engagement activity with the homeowners. These can be summarised as follows:</p> <ul style="list-style-type: none"> <li>6 cases were long-term empty properties where engagement had been paused due to external delays (e.g. legal proceedings or major building works). There is no formal process to ensure these cases are revisited at regular intervals.</li> <li>5 cases where the level of follow up engagement and review had been impacted by the resourcing and backlog issues referred to in recommendation 3 above.</li> </ul>	<p>Management should agree and document the process to be followed for the ongoing review, engagement and follow up of empty homes. This should include, but is not limited to, the expected minimum frequency at which dormant and long-term empty properties (such as those with major works or legal issues ongoing) should be reviewed.</p>	Medium	<p><b>Response:</b> Accepted</p> <p>The recommendation has been accepted, and procedural updates including changes to the database are now being implemented.</p> <p><b>Officer Responsible for Implementation:</b> Group Manager (Private Sector Housing)</p> <p><b>Timescales for Implementation:</b> 30 November 2025</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<ul style="list-style-type: none"> <li>3 cases where the storage of supporting documentation locally rather than through a central database, contributed to gaps in evidence, making it difficult to verify actions taken. These cases are now being captured as part of the backlog.</li> <li>Staff oversight and/or errors contributed to unnecessary delays in the remaining 2 cases.</li> </ul> <p>The absence of structured follow-up processes increases the risk that changes in circumstances go un-noticed, delaying the time to bring homes back into use. There is also an increased risk that resources are not targeted efficiently, and the overall impact of the empty homes programme is reduced.</p>				