# HMRC visit checklist

**Marlowe & Finch Fine Art Ltd**
What HMRC's guidance says it may ask for on a supervision visit · art market participant
Version: 2026-11-03.1+665a91aac6b6

## About this checklist

The items below are those HMRC's guidance says it may ask for, inspect or require. This is a preparation list, not a statement that the business holds them.

Each row shows what the business recorded in its interview: held, to introduce, not applicable, or not held yet. The statuses come from the business's own answers; uploading a document does not change them.

10 items: 8 held, 1 to introduce, 1 not applicable, 0 not held yet.

SAMPLE
fictitious business, for illustration


Sample pack for Marlowe & Finch Fine Art Ltd, a fictitious business. Generated 3 November 2026 from the ratified ArtGuard wording.

## 1. What HMRC may ask for

| # | What HMRC may ask for | Status | Where it is |
|---|---|---|---|
| 1 | The current firm-wide risk assessment, with the information it was based on and the record of the steps taken to prepare it (reg 18(6); HMRC AMLG1800). | **Held** | Firm-wide risk assessment (this pack) |
| 2 | Previous versions of the risk assessment, kept for at least five years (HMRC AMLG1800). | **Held** | Firm-wide risk assessment (this pack) |
| 3 | The recorded reasons for any decision that a case was not high risk despite a risk factor (HMRC AMLG1800). | **Held** | Firm-wide risk assessment (this pack) |
| 4 | The proliferation financing risk assessment, with the information it was based on (reg 18A(5)). | **Held** | Firm-wide risk assessment (this pack) |
| 5 | The written policies, controls and procedures (HMRC AMLG1900). | **Held** | AML policies, controls and procedures (this pack) |
| 6 | The training record: who was trained, when, the content and format, and any assessment of its effectiveness (HMRC AMLG11030). | **Held** | Training register (this pack) |
| 7 | Copies of the SARs the business has submitted (HMRC AMLG11100). | **Not applicable** No reports made in the past two years, so there are no copies to show. | Internal suspicious-activity report form and register (this pack) |
| 8 | The record of potential suspicious activity, the assessment of it and the reasons a SAR was or was not submitted (HMRC AMLG11100). | **Held** | Internal suspicious-activity report form and register (this pack) |
| 9 | Customer due diligence and transaction records, kept as evidence for any HMRC investigation and, where held outside the UK, readily available when HMRC requires them, with a certified translation of any document in a language the business's staff do not understand (HMRC AMLG11700; HMRC AMLG11400). | **Held** | The business's own records |
| 10 | For any case where enhanced due diligence was required but a source of funds or source of wealth measure was not taken, the evidence-based explanation of why (HMRC AMLG11630). | **To introduce** | The business's own records |

SAMPLE — fictitious business, for illustration



Sample pack for Marlowe & Finch Fine Art Ltd, a fictitious business. Generated 3 November 2026 from the ratified ArtGuard wording.

> *"HMRC may carry out spot-checks on some businesses and may also request your risk assessment at any time to check your compliance with the Regulations."*
> — HMRC AMLG1800, 8.1

> *"Your training record will need to be provided to HMRC on request in any compliance intervention to demonstrate you have complied with your obligations under the Regulations and followed this guidance."*
> — HMRC AMLG11030, 10.3

> *"You should therefore retain a copy of every SAR that you have submitted."*
> — HMRC AMLG11100, 11.2

## 2. When the business registers

When the business applies to register, HMRC asks for a declaration that it has a written risk assessment and policies, controls and procedures, and refuses the application if it does not (HMRC AMLG1800; HMRC AMLG1900).

### Sources

- MLR 2017, regulation 18 (risk assessment by relevant persons), revised text in force 30 June 2026. Cited: reg 18(6).
- HMRC, Anti-money laundering guidance for supervised businesses, AMLG1800 (risk assessment), 8 July 2026. Cited: HMRC AMLG1800.
- MLR 2017, regulation 18A (proliferation financing risk assessment), revised text in force 30 June 2026. Cited: reg 18A(5).
- HMRC, AMLG1900 (policies, controls and procedures), 8 July 2026. Cited: HMRC AMLG1900.
- HMRC, AMLG11030 (training), updated 16 July 2026. Cited: HMRC AMLG11030.
- HMRC, AMLG11100 (reporting suspicious activity), updated 17 July 2026. Cited: HMRC AMLG11100.
- HMRC, AMLG11700 (record keeping), 8 July 2026. Cited: HMRC AMLG11700.
- HMRC, AMLG11400 (identifying and verifying your customers), updated 10 July 2026. Cited: HMRC AMLG11400.
- HMRC, AMLG11630 (source of funds and source of wealth), 8 July 2026. Cited: HMRC AMLG11630.

SAMPLE — fictitious business, for illustration


Sample pack for Marlowe & Finch Fine Art Ltd, a fictitious business. Generated 3 November 2026 from the ratified ArtGuard wording.