# Training register

**Marlowe & Finch Fine Art Ltd**
Money Laundering Regulations 2017, regulation 24
Version: 2026-11-03.1+91bd5db6d198

## About this register

- The business must take appropriate measures so that its relevant employees, and agents doing the same kind of work, are made aware of the law on money laundering, terrorist financing and proliferation financing and of the data protection requirements, and are regularly trained to recognise and deal with transactions and situations that may be related to them (reg 24(1)(a)).
- It must keep a written record of those measures and of the training given (reg 24(1)(b)).
- HMRC expects training to be delivered at least annually, and more often in a higher risk business (HMRC AMLG11030).

> *"HMRC expects as a minimum that training is delivered annually with higher risk businesses conducting training on a more frequent basis."*
> — HMRC AMLG11030, 10.3

> *"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

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| **Person responsible for AML training** | Imogen Finch (the nominated officer named in the interview; write another name here if someone else is responsible) |

## 1. The nominated officer's own training

Recorded in the interview: last AML training completed on 12 May 2026.

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.

## 2. What the training should cover

HMRC recommends, as a starting point, regular training on (HMRC AMLG11030):

- "The Regulations,"
- "HMRC guidance,"
- "The risks money laundering, terrorist financing and proliferation financing posed to the business,"
- "The vulnerabilities of the business's products, services and business channels; and"
- "The business's PCPs in relation to the prevention of money laundering, terrorist financing and proliferation financing."

## 3. Register

**AML training for relevant employees:** The business gives AML training to all relevant employees and keeps a record of it. Last reviewed or completed: 12 May 2026.

| Who | Role | Date | Content (topics above) | Format | Any assessment of its effectiveness |
|---|---|---|---|---|---|
| Imogen Finch | Nominated officer (MLRO) | 12 May 2026 | | | |
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|---|---|---|---|---|---|
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Rows are filled in only from what the business has recorded. Add a row for each person trained and each session given.

## Sources

- MLR 2017, regulation 24 (training), revised text in force 30 June 2026. Cited: reg 24(1)(a); reg 24(1)(b).
- HMRC, AMLG11030 (training), updated 16 July 2026. Cited: HMRC AMLG11030.

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