*Notes:*

* *You should review this annually or on a change in the law or in the nature of your business, if earlier.*
* *There is no right or wrong way to complete the answers you give in this document. It should reflect the risks in your practice and those will differ from other notary practices. Some suggested responses are included but these are only suggestions and your practice may have other risks that should be recorded. You have to consider all of the types of risk set out under paragraph 1 to comply with the provisions of Regulation 18(1) of the Money Laundering Regulations. If you determine that a particular risk does not apply at all to your notary practice you should record that decision.*
* *You should take account of any new working practices you have introduced in recent years following the Covid 19 pandemic, for example, are you now meeting your clients via video conference call? Have you started accepting electronic signatures and what checks have you introduced if you have? Are you using the new e-apostille service?*
* *The risks stated may seem repetitious, but you are considering the same risks and the impact they have on various parts of your practice, for example, if you don’t meet every client it could be a client risk and a service risk.*
* *The risks set out here are not exhaustive, and you should add any additional risks that are peculiar to your practice.*
* *This analysis is separate from any consideration on whether the work you do actually falls within the provisions of the Money Laundering Regulations. You are obliged to document a firm-wide risk analysis even if you are comfortable that your practice falls solely within the remit of a “public certifying officer” with no substantive role in the underlying transaction as set out in Legal Sector Affinity Group Guidance (link).*
* *Section 2 of the Legal Sector Affinity Group Guidance covers the information you need to include in this risk assessment.*
* *Typing in blue needs amendment or deletion before adoption by everyone.*
* *To access the header and insert the name of the notarial practice, double-click on the header.*
* *The document has been drafted in the singular for adoption by sole practitioners, with or without staff. Multi-notary practices will need to make grammatical amendments.*
* *Wording in italics is guidance only and should be deleted before adoption as should this initial notes page.*
* *The Money Laundering and Terrorist Financing (Amendment) (No. 2) Regulations 2022 introduced a new obligation to identify, assess and mitigate the risk of proliferation financing. Proliferation financing is the act of providing funds or financial services for use, in whole or in part, in the manufacture, acquisition, development, export, trans-shipment, brokering, transport, transfer, stockpiling of, or otherwise in connection with the possession or use of, chemical, biological, radiological or nuclear weapons, including the provision of funds or financial services in connection with the means of delivery of such weapons and other CBRN-related goods and technology, in contravention of a relevant financial sanctions obligation. We have added an additional provision to the end of this template risk assessment to cover this new obligation.*

Introduction

1. I have considered where my practice is at risk of involvement in money laundering and/or terrorist financing, taking into account the size and nature of my business. This document records the risks I have assessed and conclusions I have reached in relation to:
	1. my clients;
	2. the locations in which I and my clients operate;
	3. the services I offer;
	4. the type of transactions in which I am involved;
	5. my internal and operational risks, including delivery channels; and
	6. proliferation financing.

Sources of information

|  |
| --- |
| Internal Sources of information |
| Data collected when taking on a new client |
| Suspicious activity report register |
| External Sources of information |
| Risk factors set out in the Money Laundering Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended (MLR) |
| Guidance including the Legal Sector Affinity group AML Guidance for the Legal Sector, Faculty Office risk assessment and guidance, and guidance from the Notaries SocietyHM Treasury’s list of High-Risk Third Countries, as set out in the Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No. 3) Regulations, 2022. |
| Joint Money Laundering Steering Group (JMLSG) guidance |
| HM Treasury and the Home Office national risk assessment of money laundering and terrorist financingHM Treasury National Risk Assessment of Proliferation Financing |
| Financial Action Task Force (FATF) guidance for a risk-based approach, Legal Professionals, June 2019FATF guidance on Proliferation Financing Risk Assessment and Mitigation |
| Transparency International Corruption Perceptions Index |
| Newspaper articles |

Gap analysis - information

* 1. I have assessed that there is/are [the following] [no] gaps in my risk information:
		1. [insert details of any gaps in your knowledge or information sources, for example, do you have a register of agents you use in other jurisdictions, if you use them, or do you think you should collect more information on your clients on engagement?].
	2. [*If you have decided there are no gaps -* I will reconsider this position at the next review of this risk assessment] *or, if you have decided there is a gap* [I will take the following steps to plug that gap/those gaps:
		1. *insert the actions that you will take*.]

3.3 Assessing the Risks [*This must be completed in all cases*]

|  |  |  |
| --- | --- | --- |
| **Risk Factor** | **Level of Risk**  | **Response** |
| **Client Risks***This section asks you to identify the types of clients for whom you act and asks you to assess the risk presented by those clients.* |
| I meet [most but not] all of my clients *NB this position may have changed following the Covid 19 pandemic and with increasing acceptance of e-signatures in the notary profession.* | Low *– if you always meet them*Medium – *if you almost always meet them*High – *if you never meet them* | *You should tailor your response to your practice, commenting on how you deal with the risk in each case, so, for example:*As I always make a point of meeting my clients, this is a low risk for me. If on a rare occasion I am not able to meet a client, I reflect that risk in the information I gather to identify the client, sometimes, in addition, meeting the client by video conferencing. I ask clients to prove their identity by the production of their passport and a proof of address document. I do not work for clients who seek to remain anonymous. |
| I [can/cannot] be sure of the source of a client’s funds. | High - *if you do conveyancing; work on transactions that fall within the MLR; work for Politically Exposed Persons*Low *– if your practice is that of a public certifying officer with no substantive role in the underlying transaction.* | *This is one for the conveyancers among us or those who deal with matters falling within the MLR or who work for politically exposed persons. You should be certain of the individual’s source of funds for the transaction and of their source of wealth generally. So, for example:*I ascertain the client’s source of funds for the transaction and source of wealth when I take on a new client. If it is not clear from information in the public domain or my knowledge, I ask the client to clarify their source of wealth and source of income and funds and to provide evidence. |
| I [do not] have an established client base and I am [not] trying to attract new clients | Low – *if you have worked for the same clients for many years and are comfortable that you know your client base.*Medium – *if you have been in practice for some time but are always looking to expand your business.*High – *if you are just starting out or looking to expand your business and are in the market for new clients – it makes you more vulnerable.* | *So, for example:*My practice has been in existence for many years. I have built up my client base during that period, have many repeat clients and receive recommendations for clients from law firms with which I have a long-standing relationship. To reduce this risk to a minimum, I complete the checks as and when required by the Notaries Practice Rules and the MLR, if required, on all new clients before working for them, and I endeavour to meet every client in person or by video conference call.*Or*My practice was founded in the last year. As I am building up a practice from scratch and could be vulnerable to people trying to launder money, I am taking care to reduce this risk by meeting all new clients, undertaking due diligence on those clients I don’t meet and undertaking the identity checks as and when required under the Notaries Practice Rules, and CDD when required by the MLR. |
| I have a client base that includes [a significant / moderate / minimal number of] [no] politically exposed persons (PEPs) | Low – *if zero or a minimal number*Medium – *if a moderate number*High – *if a significant number* | *An example answer might be, where you have a minimal number of PEPs approaching you:*I very rarely act for individuals who are politically exposed or are related to individuals who are politically exposed. I search the new client’s name on the internet to find out if they are politically exposed. I undertake enhanced due diligence on such individuals if I do ever act for them. |
| I have a client base that includes [a significant / moderate / minimal number of] [no] individuals or entities resident in high risk jurisdictions | Low – *if a minimal number*Medium – *if a moderate number*High – *if a significant number* | *High risk jurisdictions are specified in the HM Treasury Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No. 3) Regulations 2022 and you can also look at the Corruption Perceptions Index on the Transparency International website* [*www.transparency.org*](http://www.transparency.org)*. Your definition of high risk might be different from another notary’s definition in line with your appetite for risk.**An example answer, where you have a moderate number of individuals approaching you from a high-risk jurisdiction, might be:*I accept the risk and reduce it by taking greater care with my new client take on procedures and checks where I am instructed by a client from a high-risk jurisdiction. In addition, if appropriate, I ascertain source of income and source of wealth of such clients, to further reduce the risk. I search the list of sanctioned individuals and entities on the OFSI website when instructed by a client from a high risk jurisdiction. |
| I have a client base that includes [a significant / moderate / minimal number of] [no] individuals or entities working in high risk industries | Low – *if a minimal number*Medium – *if a moderate number*High – *if a significant number* | *High risk industries are identified in guidance and on the Transparency International website. High risk industries to you may include cash-intensive businesses, mining and construction. But note, your definition of high risk might be different from another notary’s definition in line with your appetite for risk.**An example answer, where you have a moderate number of individuals approaching you who work in high-risk industries, might be:*I accept the risk and reduce it by taking greater care with my new client take on procedures and checks where I am instructed by a client who is engaged in a high-risk industry. In addition, if appropriate, I ascertain source of income and source of wealth of such clients, to further reduce the risk. |
| I have a client base that includes [a significant / moderate / minimal number of] [no] individuals or entities working in low risk industries | Low – *if a significant number*Medium – *if a moderate number*High – *if a minimal number* | *Low risk industries include those that are themselves regulated for anti-money laundering, so regulated banks, financial and credit institutions in an EEA state and companies listed on a recognised stock exchange in an EEA state.**An example answer where you have a significant number of individuals or entity clients working in low risk industries approaching you might be:*This risk is minimal for me as I mainly act for individuals or entities who work in low risk industries. I am alive to the risk, however, and will consider it with every review of this risk analysis. |
| **Geographical Risks***This section asks you to identify the countries in which you and your clients are either based or in which you and your clients transact and to consider the risks presented by those jurisdictions.* |
| I am based in the United Kingdom. | Low | The UK is a FATF registered country and is ranked as low risk on the Transparency International Corruptions Perception Index. As such, I consider that I work in a low risk jurisdiction for money laundering and counter terrorist financing. |
| I [frequently / occasionally / rarely / never] act for clients who are resident or operating in or on transactions in jurisdictions considered to:* have minimal systems to counter money laundering and terrorist financing;
* have significant levels of corruption;
* operate high levels of secrecy.
 | High – *if you frequently act for such clients*Medium – *if you occasionally act for such clients*Low – *if you never or rarely act for such clients* | *Jurisdictions that are considered to have significant levels of corruption are those that are concerned with terrorism, money laundering and the production and supply of illicit drugs. Turn to Transparency International again for guidance* [*www.transparency.org*](http://www.transparency.org) *and also refer to HM Treasury’s list of High-Risk Third Countries per The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No. 3) Regulations 2022.**An example answer where you have a significant number of individuals or entity clients working in high risk jurisdictions approaching you might be:*I accept this risk when it arises and mitigate by stringent processes and procedures when I take on a new client. I do sanctions checks on my clients from high risk jurisdictions by searching the list on the OFSI website. I take care to understand my client’s source of wealth and source of funds before working with them on a new matter, where appropriate, and complete CDD where required under the provisions of the MLR. |
| I [frequently / occasionally / rarely / never] act for clients who are resident or operating in or on transactions in jurisdictions considered to:* have adequate systems to counter money laundering and terrorist financing;
* have low or minimal levels of corruption or other criminal activity;
* have complied with anti-money laundering and counter terrorist financing recommendations specified by FATF;
* are within the European Economic Area.
 | High – *if you rarely or never act for such clients*Medium – *if you occasionally act for such clients*Low – *if you frequently act for such clients* | *Examples of such countries would be any countries signed up to FATF, so the UK, EEA states and the USA, among others.**An example answer where you have a significant number of clients who are resident or operating in low risk jurisdictions or where your transactions frequently occur in low risk jurisdictions might be:*Most of my clients are resident or operating or involved in transactions in jurisdictions that are identified as presenting a low risk for money laundering offences. This reduces my risk of becoming involved in money laundering and terrorist financing considerably, but I still take care to follow my procedures and policies when I engage with individuals and companies from those areas. |
| I [frequently / occasionally / rarely / never] act for clients who are resident or operating in or on transactions in jurisdictions that are subject to sanctions. | High – *where you frequently or occasionally act for such clients or on such transactions*Medium – *where you rarely act for such clients or on such transactions*Low – *where you never act for such clients or on such transactions* | *Note, this risk is high even if you just occasionally act for individuals or on transactions that fit these parameters. Sanctions lists for the UK are available on the website of the Office of Financial Sanctions Implementation:* [*https://www.gov.uk/government/organisations/office-of-financial-sanctions-implementation*](https://www.gov.uk/government/organisations/office-of-financial-sanctions-implementation)*.**An example response where you occasionally act on transactions occurring in jurisdictions that are high risk for sanctions might be:*I accept this risk and check all new clients against the OFSI Sanctions list before I work for them. I additionally check the names of those clients with whom I have a long-term relationship against the sanctions lists when I repeat my risk analysis on such individuals and companies. I am aware of the jurisdictions that are subject to sanctions and consult the sanctions lists whenever I am asked to be involved in a transaction with individuals from those jurisdictions. I have signed up for OFSI updates and receive alerts whenever there is a change to the list of sanctioned individuals / entities / countries. |
| **Service Risks** *This section asks you to identify the services you provide and to consider the risks presented by those services.* |
| I meet [most but not] all of my clients*NB this position may have changed due to the Covid 19 crisis.* | Low *– if you always meet them*Medium – *if you almost always meet them*High – *if you never meet them* | *Example response if you usually meet your clients might be:*As I always make a point of meeting my clients, this is a low risk for me. If on a rare occasion I am not able to meet a client, I reflect that risk in the information I gather to identify the client, sometimes, in addition, meeting the client by video conference call. |
| I [only / mainly / sometimes / rarely] provide notarial services that fall within the exclusions set out in Part 2c of the HM Treasury approved Legal Sector Affinity Group guidance. | Low – *if you only or mainly provide such services*Medium – *if you sometimes provide such services*High – *if you rarely provide such services* | *The HM Treasury approved Legal Sector Affinity Group Guidance Part 2c states that “The Regulations do not apply to work undertaken by a notary acting solely as a public certifying officer where they have no substantive role in the underlying transaction.” See the flow chart in the template documents for guidance. Consider your role with public form documents. Are you comfortable that you have “no substantial role in the underlying transaction” when you prepare a public form document?**An example response where you only or mainly provide notarial services that fall within the exclusions set out in the guidance might be:*Most of the services I provide fall within the exclusions set out in the HM Treasury approved Legal Sector Affinity Group guidance. This means that my work rarely or never falls within the remit of the MLR, and I do not always document a risk analysis on my clients when I commence work for them. However, I record that decision and comply with my obligations set out in the Notaries Practice Rules as regards checking the identity of intervening individuals and I am alert to the risks and red flags for anti-money laundering and complete checks on an ad hoc basis when I consider it necessary to do so. |
| I [do not] deal with property transactions, which are commonly used by criminals engaged in money laundering and are identified in the national risk assessment and regulatory guidance as being high risk for money laundering or terrorist financing. | High – *where you do conveyancing*Medium – *where you are involved in other types of property transactions where a solicitor or other lawyer regulated by the MLR (in the EU) and your role goes beyond that of a public certifying officer. If you are acting on a property transaction outside of Europe, consider whether you should be treating this as a high risk.**If you are drafting a public form notarial act in relation to a property transaction, consider whether you can comfortably say that your role is solely that of a public certifying officer.*Low – *where your only involvement in property transactions is solely as a public certifying officer* | *An example where you identify your risk as medium might be:*I am aware of and accept this risk. To reduce the risk, I take care to follow my policies and procedures each time I take on a new client and I always ascertain the source of the client’s wealth and their source of funds, if required to under the MLR. |
| I [do not] provide trust and company services so [do not] help clients to create / manage trusts / companies and do not offer registered office services. | High – *where you do provide these services*Low – *where you do not provide these services* | *An example response if you do provide these services:*I offer trust and company services as part of my notarial practice. I am aware that my obligations under the MLR for this work differ from the work I do as a notary. I take care to complete CDD on every client I take on for this type of work and revisit my risk analysis of that client on a regular basis to comply with my ongoing verification obligations. |
| **Transactional Risks***This section asks you to identify the transactions in which you are involved and to consider the risks presented by those transactions.* |
| I [do not] deal with transactions involving cash. | High – *where you deal with transactions involving cash.*Low – *where you never deal with transactions involving cash. NB this does not refer to payment for your notary services in cash. Payment for legal services is not a money laundering risk and is exempted rom the MLR by the LSAG guidance.* | *Example response if you are low risk for this risk factor:*I do not deal with transactions where the consideration is being paid in cash. This greatly reduces my risk for anti-money laundering and terrorist financing. |
| I [only / mainly / sometimes / rarely] enter into non face-to-face business relationships.*NB this position may have changed following the Covid 19 pandemic and the introduction of DocuSign and e-apostilles in the notary profession.* | Low *– if you always meet your clients*Medium – *if you almost always meet your clients*High – *if you never meet your clients* | *Example response where you are low risk because you always meet your clients:*I always meet my clients. On the rare occasion where I do not meet my clients, I have the client due diligence documents certified by appropriate officials in the jurisdiction where my client is based and meet the client by video conference call. |
| I [do not] accept electronic signatures.*NB this position may have changed following the Covid 19 pandemic and on the introduction of the e-apostille process.* | Low *– if you do not accept electronic signatures*High – *if you do accept electronic signatures* | *An example answer where you do not accept electronic signatures but you do accept scanned copies of documents on occasion might be:*I do not accept electronic signatures on deeds and on other documents where I am certifying that the document was signed before me as witness and I only accept scanned copies of documents on the condition that the original follows or that I have sight of the original before completion of the transaction. *An example answer where you do use DocuSign might be:*I do accept electronic signatures on documents via the approved DocuSign procedures from NotarySign. I witness my client signing by video conference call and apply my electronic signature and seal after I have witnessed and received an alert that they have done so. I ask to see my client’s passport or other identification documents on the video call and take care to receive a copy by email for my records. If I have any concerns, I ask them to have a regulated individual in their jurisdiction certify a true copy of their ID for me, but I normally only provide the e-signing service for clients I have met previously in person. |
| **Operational risks** **/ Internal Risks / Delivery Channels***This section asks you to identify internal risks within your business, for example, the risks of abuse of a client account, or risks from deficiencies in staff training.* |
| I [do not]allow our staff to accept gifts. *This section can be deleted if you do not have any staff.* | High – *where staff are allowed to accept gifts*Medium – *where staff are allowed to accept gifts but there are checks and balances in place*Low – *where staff are not allowed to receive gifts* | *An example answer where you do not allow your staff to accept gifts might be:*I have a policy whereby my staff do not accept gifts, and that policy is known by the staff. |
| I [do not] operate a client account. | High – *where you do*Low – *where you do not* | *An example answer might be where you operate a client account might be:*I operate a client account but take care to only give the client account details out to clients when I need to and ensure that any funds held in my client account relate to a current client matter. |
| I [do not] make charitable donations. | High – *where you do make charitable donations*Medium – *where you make charitable donations but there are checks and balances in place*Low – *where you do not make charitable donations* | *An example answer where you make charitable donations but in line with a documented policy, might be:*I make charitable donations in line with my policy on charitable donations. This policy is followed firm-wide. We take care to check the charitable status of any entity before we donate to the charity.*An example answer where you do not make charitable donations from your business would be:*I only make charitable donations in my personal capacity. |
| I [do not] **accept work from intermediaries and agents in high risk jurisdictions.** | High – *where you accept work from intermediaries and agents in high risk jurisdictions*Medium – *where occasionally accept such work*Low – *where you never accept such work* | *An example answer where this is medium risk for you, as you accept work from intermediaries in high risk jurisdictions occasionally, might be:*I work with the same intermediaries many times so I build up a relationship with them. I choose to work with intermediaries who are of a size and sophistication to understand and appreciate my obligations under the anti-money laundering and terrorist financing legislation. I revisit this risk annually. |
| There are currently [no] known deficiencies in training on AML/CTF. | Low – *where there are no known deficiencies*High – *where there are known deficiencies* | *An example answer where there are no known deficiencies might be:*I [and my employees] [am] are regularly trained on anti-money laundering and terrorist financing law, policy and procedure and all of my training is up to date. I comply with the Faculty Office requirement to complete one hour’s AML training each year. |
| There appear to be [no] deficiencies in my submission of suspicious activity reports to the National Crime Agency. | Low – *where you consider there is no deficiency*High – *where you consider there is a deficiency* | *An example answer where you are comfortable with the level of suspicious activity reports you have made could be:*I am comfortable that the number of suspicious activity reports I have made in the last year is appropriate and I will review this annually. |
| I[do not]have clear financial controls | Low – *where you have clear financial controls*High – *where you do not have clear financial controls* | *An example answer where you consider this a low risk for your practice might be:*My financial controls are clear and unambiguous. I use a well-known electronic accounting system that is connected to my accountants and is fully set up for HM Government’s making tax digital procedures. |
| [No] employees have the opportunity to engage in or facilitate money laundering and/or terrorist financing *Delete this section if you do not have employees.* | Low – *where you consider that no employees have the means to engage in money laundering*High – *where you consider that employees have the means to engage in money laundering.* | *An example answer where no employee has the means to engage in money laundering might be:*No employee has the opportunity to facilitate money laundering or terrorist financing. I check my bank accounts regularly, there is always more than one member of the team working on a transaction and I have signing policies and policies about client engagement that mean no one can act alone. |
| I[do not]accept cash | Low – *where you never accept or occasionally accept cash*High – *where you regularly accept cash including fees in advance and fees for payment of disbursements.**NB the payment of legal fees is exempted from the MLR in the Legal Sector Affinity Group Guidance but you should take care with fees in advance or fees for disbursements.* | *An example answer where you do not accept cash might be:*I do not accept cash payment of my fees so this risk factor is non-existent.*An example answer where you do accept cash payment of your fees might be:*I do accept cash payments but reduce the risk of cash payments by enquiring about my clients’ backgrounds and undertaking the checks required by the Notarial Practice Rules. Furthermore, I note that payment of my fees is exempted from the provisions of the MLR by the HM Treasury approved LSAG guidance, but I take care and complete full client due diligence where the client pays money in advance for my fees or for the fees of third parties on matters that fall within the remit of the MLR. |
| I[do not]accept payment of fees from third parties other than the client or the regulated lending party, when I am paid out of the loan advance | Low – *where you never accept or occasionally accept the payment of your fees by a third party other than the client*High – *where you regularly accept the payment of your fees by a third party other than the client.* | *An example answer where you do not accept fees from third parties or where you only accept fees from regulated lending parties where you are acting on a property matter might be:*Ido not accept fees from third parties and only accept payment from the client [or the regulated lending party when Iam paid out of the loan advance - *conveyancers*]. This reduces my risk of becoming involved in anti-money laundering and terrorist financing. |
| **Proliferation financing risk***This section asks you to consider the risk that your business could enable the transfer etc of chemical, biological, radiological or nuclear weapons* |
| My practice [does not] get involved in transactions involving the provision of funds or financial services for use, in whole or in part, in the manufacture, acquisition, development, export, trans-shipment, brokering, transport, transfer, stockpiling of, or otherwise in connection with the possession or use of, chemical, biological, radiological or nuclear weapons, including the provision of funds or financial services in connection with the means of delivery of such weapons and other CBRN-related goods and technology, in contravention of a relevant financial sanctions obligation | Low | *An example answer where you do not get involved in transactions involving proliferation financing might be:*This risk is minimal for me and my practice as I mainly act for individuals or entities who do not work in high-risk industries and are not based in high-risk jurisdictions. I am alive to the risk, however, and reduce it further by doing sanctions checks on my new clients, using the OFSI consolidated search engine. Meeting my clients face to face means I further reduce the risk by speaking to them and understanding the industries in which they work. In the main, my practice is that of a public certifying officer, and I rarely, if ever, become substantively involved in a transaction. |

Gap analysis – opportunities to improve

* 1. I have assessed that there is/are [the following] [no] gap[s] in my current processes:
		1. [insert details of any gaps in your processes, for example, has it been a while since the staff were trained on anti-money laundering law and your policies?].
	2. [*If you have decided there are no gaps -* I will reconsider this position at the next review of this risk assessment] *or* [I will take the following steps to plug that gap/those gaps:
		1. *insert the actions that you will take, for example* I will arrange training for the team within the next 12 months.]

Actions *(if any)*

| **Action** | **Deadline** | **Status** |
| --- | --- | --- |
|  |  |  |

Monitoring and review

* 1. I will review this risk assessment on an annual basis, or in response to a change in the law or the nature of my business.

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[Nominated Officer]/name of notary public if sole practitioner

|  |  |
| --- | --- |
| Drafted: | [Insert Date] |
| Updated: | [Insert Date]  |
| Next review date: | [Insert Date]  |