



FINANCIAL INTELLIGENCE CENTRE, GHANA

**ANNUAL
REPORT
2023**

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Foreword by the Minister of Finance

It is with great pleasure that I present the 2023 Annual Report of the Financial Intelligence Centre (FIC), an institution that continues to play a pivotal role in safeguarding the integrity of Ghana's financial system. In an increasingly complex global financial landscape, the FIC has demonstrated remarkable resilience, innovation, and commitment in the fight against money laundering, terrorist financing, proliferation financing (ML/TF/PF) and other forms of financial crime.

Over the course of the year, the Centre recorded significant progress in advancing its strategic objectives. Through the adoption of advanced data analytics, aligned with compliance frameworks with international standards, and the strengthening of cross-border and institutional partnerships, the FIC has reaffirmed its position as a cornerstone of our national anti-money laundering, countering the financing of terrorism and proliferation financing (AML/CFT/CPF) regime.

These efforts come at a critical time as Ghana prepares for its next mutual evaluation under the auspices of the Intergovernmental Action Group against ML/TF in West Africa (GIABA) and the

Financial Action Task Force (FATF). I am particularly encouraged by the Centre's proactive approach in initiating a comprehensive National Risk Assessment (NRA) and Sectoral Risk Assessment to identify and address emerging threats including environmental crimes, proliferation financing, tax-related offences, and sectoral vulnerabilities in areas such as hospitality and automobile trading.

The Ministry of Finance fully supports the work of the FIC and remains committed to providing the necessary policy direction and resources to enable the FIC to fulfill its mandate effectively. Combating illicit financial flows is not only essential to preserving the integrity of our financial system, but it is also a vital component of national development and good governance. I commend the leadership and staff of the FIC for their dedication and professionalism throughout the year.

To our domestic and international partners, your continued collaboration is deeply appreciated. Together, we must remain vigilant and adaptive as we strive toward a transparent, secure, and resilient financial environment for Ghana.



Message from the Chief Executive Officer

In 2023, the Financial Intelligence Centre achieved significant milestones in its ongoing efforts to safeguard and strengthen the integrity of the financial system. Throughout the year, we advanced sectoral modernization through the adoption of advanced data analytics, enhanced our compliance framework in alignment with international standards, and deepened collaboration across both institutional and transnational levels. These achievements are a testament to our steadfast commitment to innovation, vigilance, and the fulfilment of our core mandate—not only in the detection and investigation of illicit financial activities, but also in upholding transparency and accountability in the public interest.

Looking ahead to 2024, the FIC is committed to building on this progress as we prepare for the upcoming Mutual Evaluation, beginning with the National Risk Assessment (NRA). As part of this process, we aim to assess emerging risk areas, including environmental crimes, the proliferation of weapons of mass destruction, tax-related offences, and vulnerabilities in specific sectors such as hospitality and the automobile dealership industry.

We extend our sincere appreciation to the Minister of Finance, Governor, Bank of Ghana, the Board, Staff of FIC and all stakeholders for your continued support as we work collaboratively to foster a transparent and secure financial ecosystem for Ghana.

Abbreviations/acronyms

AML/CFT/CPF	Anti-Money Laundering, Countering the Financing of Terrorism and Proliferation Financing
BoG	Bank of Ghana
CTRs	Cash Transaction Reports
GPS	Criminal Investigation Department of the Ghana Police Service
CDRs	Currency Declaration Forms
EOCO	Economic and Organised Crime Office
ECTR	Electronic Currency Transaction Reports
FATF	Financial Action Task Force
FIC	Financial Intelligence Centre
FIU	Financial Intelligence Unit
Fintechs	Financial Technologies
GRA	Ghana Revenue Authority
IRs	Intelligence Reports
GIABA	Inter-Governmental Action Group against Money Laundering in West Africa
KYC/CDD	Know Your Customer/Customer Due Diligence
LEA	Law Enforcement Agency
MFIs	Micro Finance Institutions
NIB	National Intelligence Bureau
NSCS	National Security Council Secretariat
NBFIs	Non-Bank Financial Institutions
OSP	Office of the Special Prosecutor
RFI	Request for Information
RCBs	Rural and Community Banks
SDs	Spontaneous Disseminations
STR	Suspicious Transaction Report

General Information

Anti-Money Laundering Act, 2020 (Act 1044) mandates the Financial Intelligence Centre (FIC) to fight money laundering, terrorism financing and proliferation financing as well as all forms of economic crime. The FIC requests, receives, analyses, interprets and disseminates information concerning suspected proceeds of crime and terrorist property, as provided under the Act or any other law. The Centre liaises with law enforcement and other Competent Authorities to execute its mandate. The FIC maintains a set of ethical values to promote effectiveness and efficiency. The understanding of these values provides guidance to the achievement of the mission and vision of the Centre.

Mission

To protect the Ghanaian economy from the scourge of Money Laundering and Terrorist Financing for the enhancement of national and global economic stability and growth.

Vision

An economically strong Ghana free of the destructive effects of Money Laundering, Terrorism Financing and other transnational financial crimes.

Values

- Confidentiality
- Integrity
- Team Spirit
- Professionalism
- Accountability

Guiding Principles:

- Foster collaborative and cooperative integration across agencies through technology and other opportunities.
- Share actionable intelligence with relevant agencies in a timely and secured manner.
- Develop and maintain a well-trained and disciplined staff capable of assessing and responding to the changing needs of the law enforcement community and other stakeholders in a prompt and professional manner.
- Promote public integrity by sensitizing the general public on AML/CFT/CPF issues.

International Bodies

The FIC does not work in isolation in the fight against ML/TF/PF as its mandate is an extension of the Financial Action Task Force (FATF) and the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) and prides itself as an EGMONT group member.

Financial Action Task Force (FATF)

The FATF is an independent inter-governmental body that develops and promotes policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The FATF Recommendations are recognized as the global anti-money laundering (AML) and counter-terrorist financing (CFT) standards that aim to prevent illegal activities that harm the cause of society.

GIABA

The Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) is West Africa's regional body against money laundering, terrorist financing, and Proliferation Financing (ML/TF/PF). GIABA is both a specialized institution of the Economic Community of West African States (ECOWAS) established in December 2000 and a FATF-Style Regional Body mandated to:

- i. Facilitate and ensure that Member States adopt adequate measures against ML/TF/PF in line with acceptable international practices and standards. These are based on the FATF 40 Recommendations, with specific regional peculiarities taken into account.
- ii. Provide a forum for dialogue and share experiences among the member States, thus creating strong intra- regional cooperation.
- iii. Organize self-evaluations (on-going monitoring) and Mutual Evaluations of compliance by the member States, using FATF Methodology.
- iv. Help member States establish and implement robust and functioning AML/CFT/CPF regimes (coordination bodies, legislation, FIUs, mutual legal assistance treaties, training, etc.)

EGMONT

Egmont Group facilitates and prompts the exchange of information, knowledge, and cooperation amongst member FIUs. The Egmont Group provides FIUs with a platform to securely exchange expertise and financial intelligence to combat money laundering, terrorist financing, proliferation financing and associated predicate crimes. This is because it recognizes that financial intelligence is paramount and has become the cornerstone of international efforts to ML/TF/PF and associated predicate offences.

Performance Information

The FIC executes its daily operational activities through its departments. These are: Analysis, Compliance, Research, International Cooperation and Information Technology. Similarly, administrative duties are performed by the Human Resources, Accounts, Internal Audit, Registry, Access Control and the Secretariat. Each Unit though unique does not work in isolation.

Domestic Stakeholders and Legal Regime

FATF Recommendation 2 enjoins countries to enact AML/CFT/CPF policies in relation to the outcomes of their risk assessments and cooperate with each other to enable them to coordinate and exchange information domestically in line with data protection and privacy rules to combat money laundering, terrorism financing and proliferation financing. The FIC collaborated with relevant stakeholders in the fight against ML/TF/PF to crack down on financial crimes. This is evident in the number of stakeholder engagements carried out with Competent Authorities including Regulators such as the Bank of Ghana (BoG), Ghana Revenue Authority (GRA), National Security Council Secretariate (NSCS), Commission on Human Rights and Administrative Justice (CHRAJ), National Intelligence Bureau (NIB), the Economic and Organised Crime Office (EOCO), Criminal Investigation Department of the Ghana Police Service (GPS) and the Office of the Special Prosecutor (OSP). Other domestic engagements were with Ministries and Departments, notable among them were the Ministry of National Security and the Ministry of Justice and the Attorney General's Department as well as Civil Society Organisations which included the Ghana

Integrity Initiative (Transparency International, Ghana) and Ghana Extractive Industry Transparency Initiative (GHEITI). Find below some of the Intelligence Reports (IRs) disseminated during the period.

Operational Analysis

Section 38 of the Anti-Money laundering Act 2020, (Act 1044) stipulates that Accountable Institutions (AIs) should submit Suspicious Transaction Reports (STR) on funds regarding suspected money laundering, financing of terrorism, proliferation financing, tax evasion or any other unlawful activity to the FIC. These reports received through the goAML platform were analysed for further action.

Highlights on analysis of STRs Received and IRs Disseminated

The Analysis Unit of the Centre received a total of two thousand, one hundred and fifty-two (2152) Suspicious Transactions and Activity Reports in the business year of 2023. A total of one hundred and ninety-two (192) of these reports were disseminated as Intelligence Reports (IRs) to Law Enforcement Agencies (LEAs) for further actions.

Summary Actions Taken on STRs

The FIC referred cases to service providers to take actions regarding fraudulent transactions as defined in the FATF Recommendations per the mandate of money transfer service businesses to ensure compliance. In addition, reports which did not require further actions were kept in view, while those which needed further intelligence gathered were acted upon to facilitate LEA investigations.

Below are tables and graphs representing a trend analysis by sectors and predicate offences of STRs.

Table 1

	Yearly Total				
Suspicious Activity Reports	2019	2020	2021	2022	2023
Received	1230	3524	2973	2946	2152
Disseminated	174	297	190	72	192

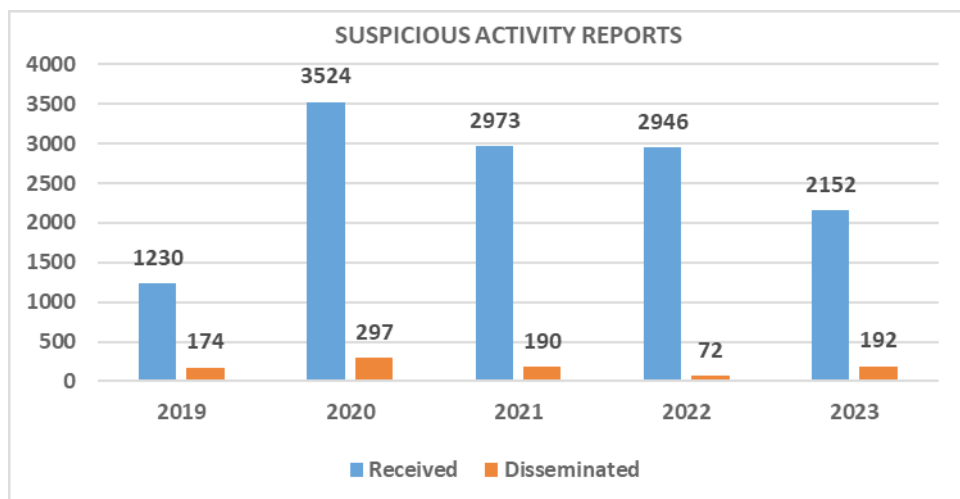


Figure 1: Suspicious Activity Reports

Table 2: STR distribution by Sectors

Sectors	Yearly Distribution				
	2019	2020	2021	2022	2023
Banking	1214	3094	2942	2886	2096
NBFIs	4	0	23	35	47
Capital Market Operators	1	0	1	0	2
Insurance Companies	2	0	1	1	0
DNFBPs	2	12	0	21	6
Others	7	0	3	3	1
TOTAL	1230	3106	2973	2946	2152

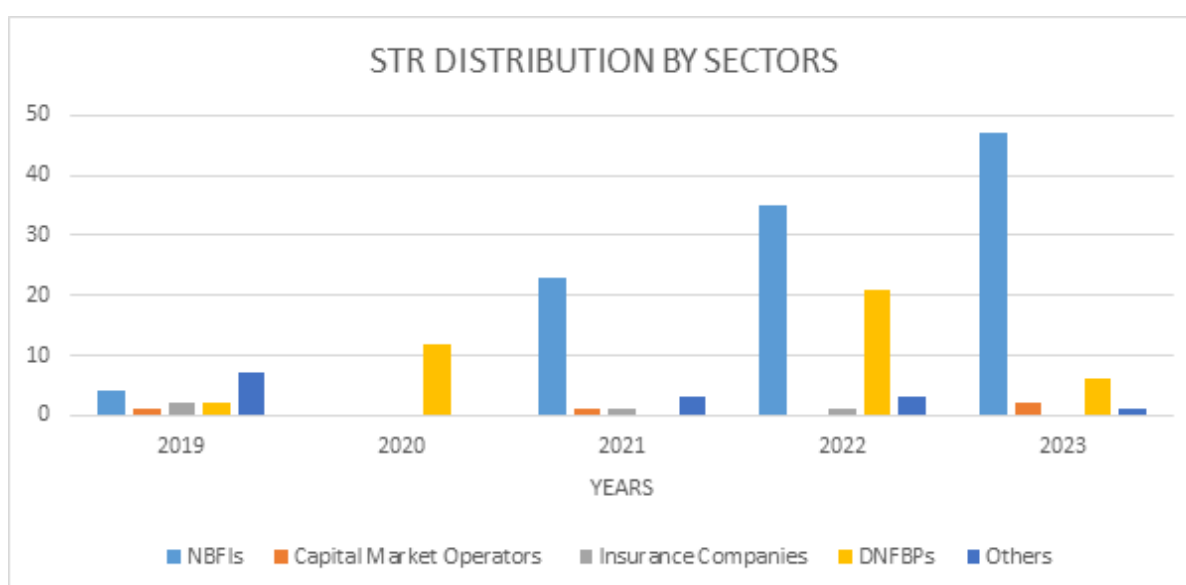


Figure 2: STR Distribution by Sectors

Table 3: STR distribution among NBFIs

Nonbank Financial Institutions	Yearly Distribution		
	2021	2022	2023
Rural and Community Banks	4	6	1
Savings & Loans Companies	10	2	10
Microfinance	0	1	0
Fintech Companies	8	18	32
TELCOS	1	8	4
Total	23	35	47

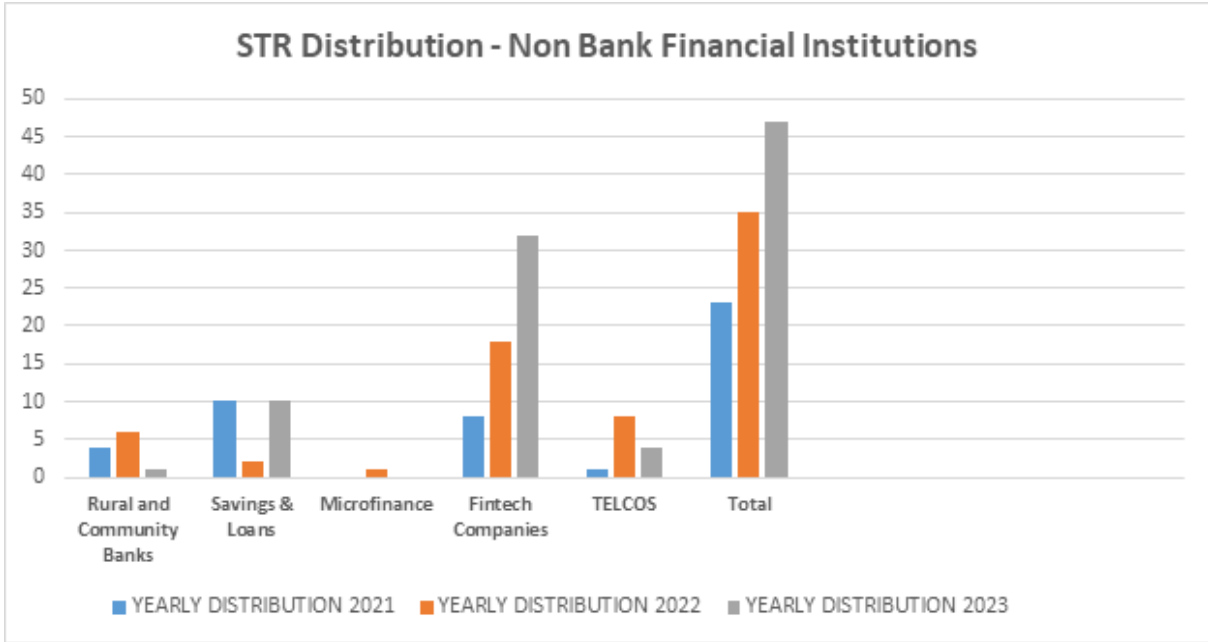


Figure 3: STR distribution among NBFIs

Table 4: IRs disseminated to Intelligence LEAs 2023

Name of Institution	Number Disseminated
EOCO	27
NSCS	1
GRA	162
CID	2
TOTAL	192

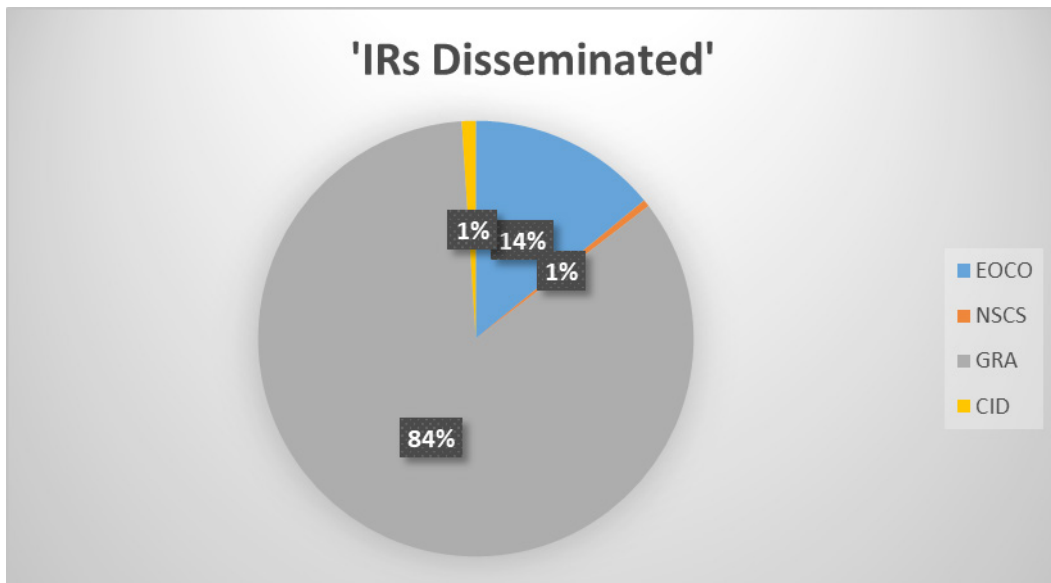


figure 4: IRs disseminated

Table 5: Year by year distribution of predicate offenses underlying STRs

Predicate Offences	Year By Year Distribution		
	2021	2022	2023
Drug Trafficking	1	0	2
Tax Evasion	140	121	69
Forgery	4	7	0
Fraud	327	409	173
Trade Based Money Laundering	0	92	15
Bribery and Corruption	3	1	2
Market Manipulation	4	2	0
Environmental Crime	0	1	0
Robbery or Stealing	11	5	1
Human Trafficking	2	0	1
Arm Trafficking	1	0	0
Murder	0	0	1
Counterfeiting of Currency	0	0	1
Others	0	98	180
TOTAL	493	638	445

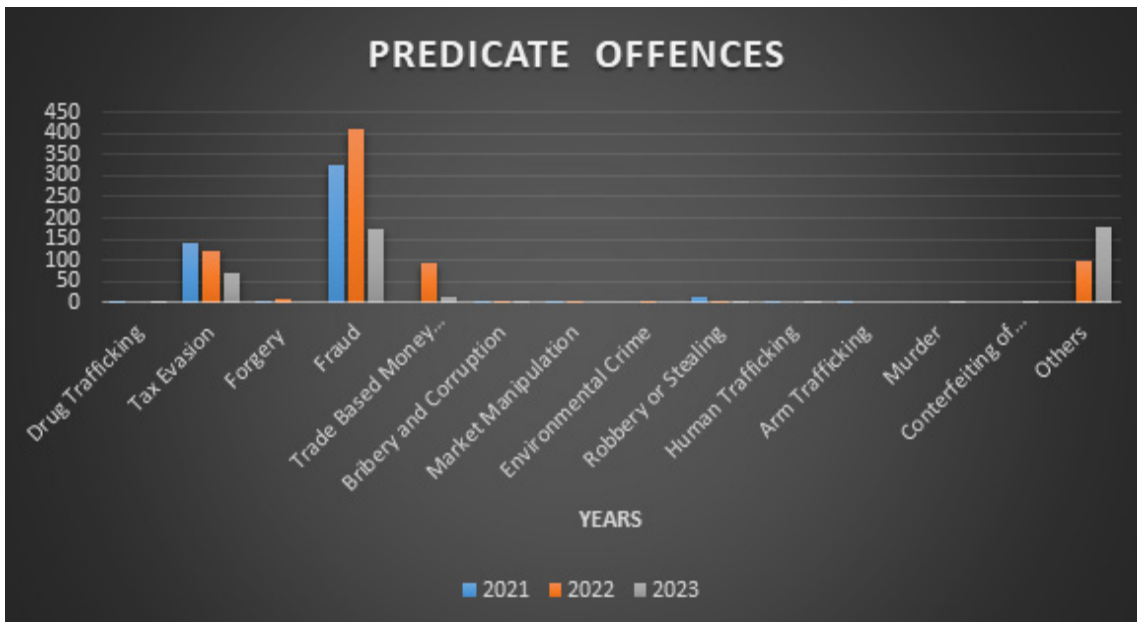


figure 5: Predicate Offences

Compliance and Outreach

The Unit is responsible for the continuous awareness creation/sensitization programmes on ML/TF/PF for Financial Institutions including Non-Bank Financial Institutions (NBFIs) particularly the Rural and Community Banks (RCBs), Micro Finance Institutions (MFIs), Financial Technologies (Fintechs), Forex Bureaus and Mobile Money Operators and onboarding of Savings and Loans Companies, RCBs and MFIs on the go-AML Portal. Further, the FIC through the Unit received threshold reports from AIs for intelligence gathering purposes. These are Cash Transaction Reports (CTRs), Electronic Currency Transaction Reports and Currency Declaration Reports (ECTRs). For the year under review, a total of 2,191,001 (CTRs) and 1,714,577 (ECTRs) were received. Also, the Customs Division of the GRA submitted 1,620 Currency Declaration Forms (CDRs) to the Centre. Below is a pictorial representation of the reports.

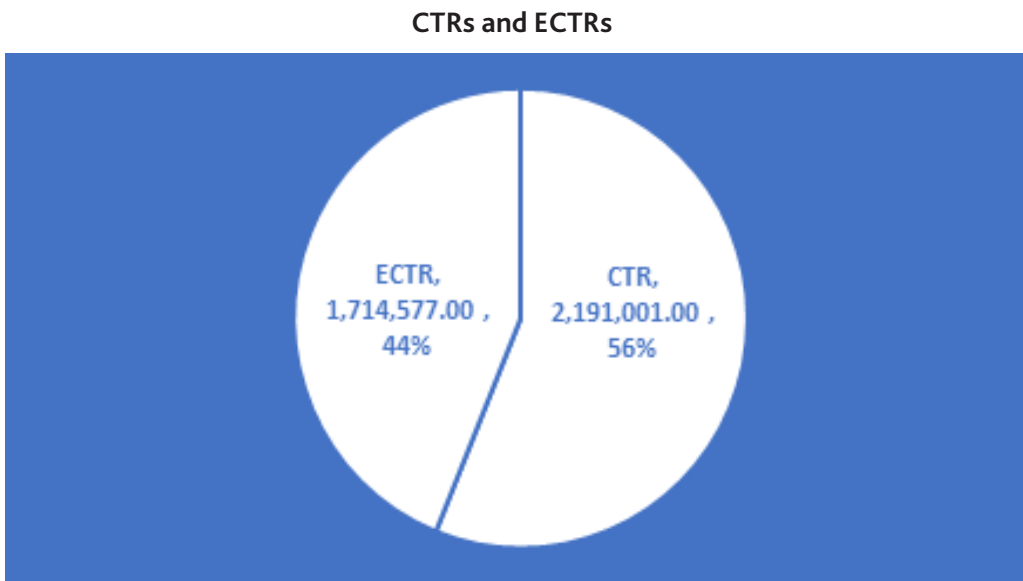


figure 6

Table 6: Currency Declaration Report For 2023

CURRENCY	AMOUNT
USD	76,737,736.0
GBP	1,431,095.0
EURO	1,424,015.0
CFA	592,491,310
CEDIS	1,479,000.0

AML/CFT & CPF Training and Awareness Programmes



Within the period under review, FIC conducted several outreach programmes such as trainings, orientations and sensitization workshops for all the AIs including Banks and NBFIs as shown in the pictures above. The FIC honoured several training requests from some Banks and NBFIs to interact with Board of Directors, Anti-Money Laundering Reporting Officers, Key Management Personnel and staff.

A total of eight hundred and eighty-eight (888) participants from the banking sector were trained. Additionally, eighty-four (84), Fintech Officials from 54 Fintech Companies were also trained within the period under review.

The training sessions were face-to-face (in-person) aimed at deepening the understanding of participants' knowledge on AML/CFT/CPF issues and creating awareness on their obligations under the Anti-Money Laundering Act, 2020 (Act 1044).

The thematic areas covered during the training sessions included:

- FATF Standards, with special focus on Preventive Measures.
- Money Laundering/Terrorist Financing Red Flags/ Sanctions Regime.
- Findings and Recommendations of Risk Assessment on Legal Persons and Arrangements.
- Update on Mutual Evaluation and other current ML/TF/PF issues.
- Findings and recommendations of the Revised National Risk Assessment Report of Ghana.
- Know Your Customer/Customer Due Diligence (KYC/CDD) requirements.
- Reporting requirements/obligations of the Accountable Institutions (reporting entities) under the Anti-Money Laundering Act, 2020 (Act 1044).
- General overview of AML/CFT/CPF.
- Risk-Based Supervision and Compliance Framework.
- Hawala and Informal Value Transfer System (IVTS).
- Cash Couriers or Mules.
- Emerging payment methods and its associated risks.
- Value Transfer through Virtual World.

Table 7: Breakdown of trainings for the banking sector within the period under review.

	Institutions Trained	Total Number of People Trained
Quarter 2	Managing Directors, Chief Executive Officers Key Management Personnel, Chief Compliance/Risk Mangers of some Banks and Non-Bank Financial Institutions and Rural/Community Banks.	465
Quarter 3	Anti-Money Laundering Reporting Officers, Key Management Personnel, and staff of some Rural and Community Banks, Micro-finance Institutions, and Savings and Loans Companies.	305
Quarter 4	Board of Directors, Key Management Personnel, and staff of some Banks and Non-Bank Financial Institutions and Financial Services Ghana, Fintech.	118

Other AML/CFT/CPF Related Programmes:

- During the third quarter of 2023, BoG in collaboration with the FIC organised Regional Capacity Building Workshops for RCBs and MFIs in Ghana. Among the objectives of the workshops was to register and introduce the newly appointed Anti-Money Laundering Reporting Officers to the goAML reporting software and also reiterate their obligations as AIs. In all, three hundred and eighty-one (381) individuals participated.
- FIC in partnership with the International Monetary Fund (IMF) and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, organised a capacity building workshop on Risk-Based Supervision and its importance in the fight against money laundering/terrorist financing/proliferation financing. The workshop served as a platform for all the Regulatory and Supervisory Bodies to discuss very important issues regarding Ghana's AML/CFT/CPF regime under the auspices of the Regulators' Forum.

The Forum focused on preparations towards the 2nd National Risk Assessment (NRA) and the Third (3rd) Round of AML/CFT/CPF Mutual Evaluation exercise scheduled for 2025/2026.

The exercises would enable the country to ascertain and understand changes in its ML/TF/PF risk profile, while affording the country the opportunity to revise the National Anti-Money Laundering, Countering the Financing of Terrorism and Proliferation Financing (AML/CFT/CPF) Policy and Action Plan to mitigate the identified risks.

Technical Assistance

The go-AML Portal remains the medium for the receipt, analysis and dissemination of intelligence. Currently, majority of Ghana's regulated entities are registered on the portal, and the FIC seeks to onboard the remaining in the coming years. The FIC in addition received substantial Technical Assistance from some countries and international organisations such as the United Nations Office on Drug and Crime, GIZ and GIABA.

Domestic Cooperation

The FIC collaborated with several institutions to work on cases and also jointly execute duties by serving on various taskforces such as the National Security and Economic and Financial Crimes. Also, the FIC's collaboration with the Bank of Ghana continues to ensure that appropriate individuals are nominated and recruited for employment through its interagency collaboration with relevant agencies. In view of this, the FIC received over five hundred and seventy (570) due diligence requests from the Banking Supervision, Other Financial Institutions Supervision, Payment System, Fintech and Human Resource Departments of the Bank of Ghana. The FIC continues to collaborate with the relevant agencies for the required action. Subsequently feedback on these requests were forwarded to the respective departments. In accordance with FATF Recommendation 2, countries are to ensure that there are AML/CFT/CPF policies and effective mechanisms to guide national cooperation and coordination on exchange of information.

Table 8: Requests from LEAs (2020-2023).

LEAs	Year			
	2020	2021	2022	2023
NIB	18	22	37	36
CID	89	66	57	14
EOCO	73	35	122	60
GRA	43	112	32	21
NACOC	4	1	2	2
OSP	2	0	3	2
NSCS	3	13	42	38
OTHERS	26	10	9	14
TOTAL	258	259	304	187

International Cooperation

The FIC continues to engage countries and international partners through memorandum of understanding (MOU) in the fight against money laundering and terrorism financing as well as proliferation financing. For instance, in 2023, Ghana signed MOUs with Algeria, Latvia, Ethiopia and Gabon. This aligns with FATF Recommendation 37 and 40 which require countries to rapidly, constructively and effectively provide the widest possible range of mutual legal assistance in relation to money laundering, associated predicate offences and terrorist financing investigations, prosecutions and related proceedings. These further mandate countries to do so both spontaneously and upon request under lawful basis. In the light of this, the year 2023 just as previous years witnessed information exchange and request from our foreign counterparts. Find below some of the requests made in 2023.

Table 9: Request for information (foreign)

Information Exchange	Yearly Distribution				
	2019	2020	2021	2022	2023
Spontaneous Disseminations (SDs)	6	7	1	18	9
Request For Information (RFI)	21	27	18	1	20

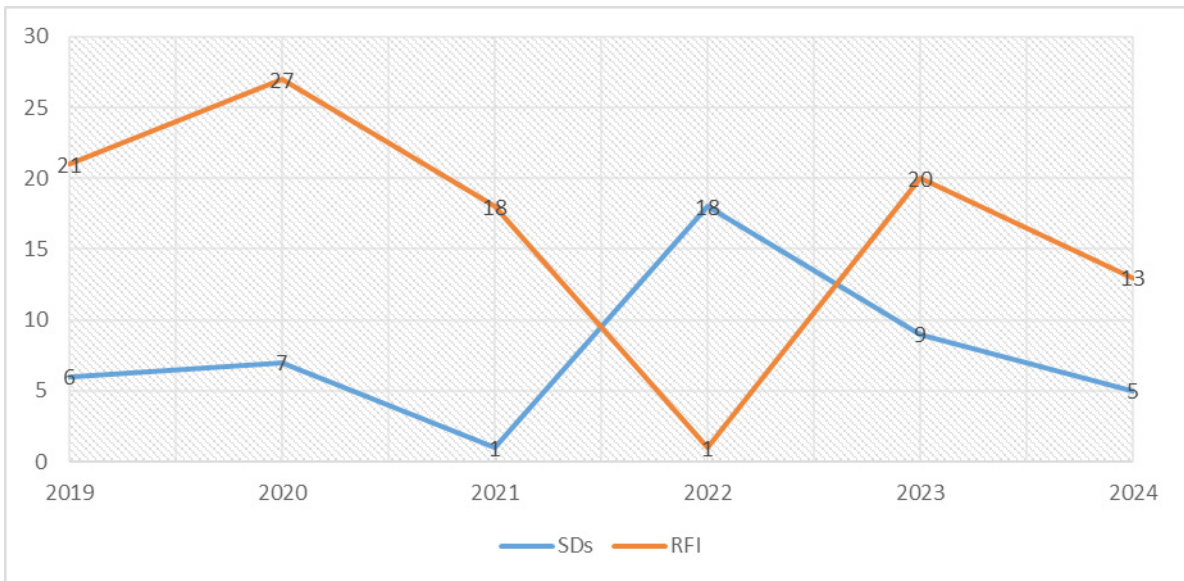


figure 7

Capacity Building Workshops and Trainings for Staff

The Human Resource Unit’s responsibility of identifying and developing the training needs of staff of the FIC lead to its engagement with relevant stakeholders to achieve this role. Thus, the Unit received invitations to participate in programmes organised by several institutions including the Kofi Annan International Peace Keeping Training Centre (KAIPTC), West African Regional Training Centre, Ministry of Information, International Organisation for Migration and the United Nations Office on Drug and Crime to increase the knowledge base of its staff. Some of the topics covered were Criminal Justice Executive course, Financial investigation for public corruption, Collaborative policing, the Impact of disinformation on electoral integrity, peace and security in Africa, Middle police management, 3rd Migration data coordination

roundtable and Information sharing on the findings of typology research study on serious and organised crime between Ghana and Nigeria.

In addition, the HR Unit ensured that the welfare of Staff, especially, health was prioritised for improved performance. In this regard a number of health practitioners enlightened staff on some daily habits to either discontinue or sustain for improved life to effectively carry out duties.

Achievements

- Ghana successfully hosted the GIABA Public Sector Consultative Forum in August 2023 on the theme “Enhancing Beneficial Ownership Transparency in West Africa”. seventy (70) participants were drawn from all GIABA member States.
- The FIC in collaboration with GIZ, Ghana engaged the services of a consultant to develop AML/CFT Guidelines for Lawyers and Accountants.
- FIC in collaboration with Securities and Exchange Commission (SEC) and GIZ engaged sector players to revise the SEC/FIC AML/CFT/CPF Guidelines and other AML documents. Bank of Ghana, SEC, GIZ, FIC, representatives from of the Market Operators were part of this process.
- The NPO secretariat in collaboration with FIC embarked on working visit and monitoring to thirty-two (32) NPOs within the Upper East and Upper West Regions of Ghana.
- The FIC in collaboration with GIZ, Ghana engaged the services of two consultants from the World Bank to train regulators and other relevant stakeholders on preparing for Ghana’s Third (3rd) Round of Mutual Evaluation exercise. The training was focused on Technical Compliance where all the 40 Recommendations of FATF were looked at as well as the 11 Immediate Outcomes with concentration on IO3 & IO4.
- The National Security Council Secretariat (NSCS) and the British High Commission embarked on “Operation Home Shield Exercise” in November 2023. Operation Home Shield brings together all the security apparatus within the country to assess the country’s preparedness and readiness to terrorist attack through several simulation exercises.

Challenges

- **Funding Delays** – The Centre continues to experience untimely disbursement of approved funds, affecting operational efficiency and planned initiatives.
- **Resource Constraints** – Limited office space and infrastructure remain a challenge, impacting the ability to expand operations and accommodate growing personnel needs.
- **Regulatory Gaps** – The absence of a comprehensive legal and institutional framework for regulating some of the Designated Non-Financial Businesses and Professions (DNFBPs) hinders effective oversight and compliance enforcement.
- **Technological Limitations** – While strides have been made in digital reporting, further investment is needed to enhance data analytics and intelligence-sharing capabilities.
- **Capacity Building Needs** – Continuous training for stakeholders, including law enforcement and financial institutions, is required to keep pace with evolving financial crime trends.

Prospects

- **Improved Funding Mechanisms** – Advocacy for timely release of funds and increased budgetary allocation could improve operational efficiency.
- **Expansion of Digital Infrastructure** – Investments in technology, including AI-driven financial crime detection tools, will enhance monitoring and reporting capabilities.
- **Enhanced Stakeholder Collaboration** – Strengthening partnerships with international Financial Intelligence Units (FIU) and local regulatory bodies will improve Ghana's financial crime prevention framework.
- **Public Awareness Initiatives** – Increased education and sensitization programs would promote compliance among DNFBPs and other key sectors.

Way Forward

- **Legislative Advancements** – Advocate for the passage of the Non-Profit Organization (NPO) Bill to strengthen regulatory oversight and compliance.
- **Strengthening Legal Frameworks** – Support amendments to existing laws governing key stakeholder institutions to align with international best practices in financial intelligence and anti-money laundering efforts.
- **Enhancing Technological Capabilities** – Invest in digital infrastructure to improve data analytics, intelligence-sharing, and suspicious transaction reporting mechanisms.
- **Capacity Building & Public Awareness** – Enhance training programmes for financial institutions, law enforcement agencies, and DNFBPs to promote compliance and awareness of AML/CFT regulations.
- **Strengthening International Collaboration** – Foster partnerships with global FIU and regulatory bodies to improve Ghana's financial crime prevention framework.
- **National Risk Assessment (NRA) Preparation** – Ghana's Second National Risk Assessment (NRA) blueprint launch, aimed at identifying vulnerabilities in the financial system and strengthening regulatory frameworks.
- **Multi-Stakeholder Engagements** – Facilitate discussions on Ghana's preparedness for AML/CFT/CPF evaluations, ensuring compliance with international standards.
- **Policy Development & Compliance Enhancement** – Work closely with regulators and other stakeholders to improve Ghana's AML/CFT/CPF regime and align with global best practices.

