

LUMEN & LEVER

AI Usage Control Baseline

Specimen Output

This document illustrates the deliverables produced by an AI Usage Control Baseline engagement. All organisation names, roles, tools, and data are fictionalised. No real entity is represented.

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Classification: Specimen

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Executive Summary

This document presents the findings of an AI Usage Control Baseline engagement conducted for [Organisation Name], a mid-market professional services firm with approximately 280 staff across three Australian offices.

The engagement identified 16 distinct AI use cases across 6 functional areas. Of these, 7 were previously unknown to leadership. The majority involved general-purpose large language models accessed through browser-based interfaces. Two involved embedded AI features within licensed enterprise software. Three involved personal devices or personal accounts being used to process organisational information through external AI tools.

Three uses were classified as Stop, requiring immediate management attention. Two of these involved data leaving the organisation through side channels: a staff member photographing whiteboard content with a personal phone and uploading images to ChatGPT for summarisation, and another recording client meetings on a personal device and running the audio through a third-party transcription service with no data processing agreement.

Key finding: AI is already operational across multiple functions. The organisation has no approved-use policy, no central register, and no review discipline for AI-generated outputs. Three side-channel patterns were identified where organisational data is leaving through personal devices and accounts without any visibility or control.

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AI Use Register

The following register documents all AI use cases identified during the engagement. Uses surfaced through contradiction checks and role-based follow-up are marked as undisclosed.

Ref	Function	Tool / Channel	Nature of Use	Review	Disclosed
U-01	Marketing	ChatGPT (browser)	Blog drafting, social copy	Yes	Yes
U-02	Marketing	ChatGPT (browser)	Client proposal drafting	Partial	No
U-03	Legal	ChatGPT (browser)	Contract clause research	Yes	Yes
U-04	Legal	CoCounsel (embedded)	Document review assist	Yes	Yes
U-05	Legal	ChatGPT (personal account)	Running draft contracts through personal login	No	No
U-06	HR	ChatGPT (browser)	Job description drafting	Yes	Yes
U-07	HR	ChatGPT (browser)	Resume screening summaries	No	No
U-08	Finance	Excel Copilot	Forecast model generation	Partial	Yes
U-09	Finance	ChatGPT (browser)	Board paper drafting	Yes	No
U-10	Operations	Otter.ai (personal account)	Meeting transcription via personal device	No	No
U-11	Operations	ChatGPT (browser)	Process documentation	Yes	Yes

Ref	Function	Tool / Channel	Nature of Use	Review	Disclosed
U-12	Operations	ChatGPT (phone, photo upload)	Photographing whiteboards and uploading to AI	No	No
U-13	Client Services	ChatGPT (browser)	Client email drafting	Partial	No
U-14	Client Services	ChatGPT (browser)	Complaint response drafts sent without review	No	No
U-15	IT	GitHub Copilot	Code generation assist	Yes	Yes
U-16	IT	ChatGPT (browser)	Security policy drafting	Yes	Yes

7 of 16 use cases were not previously disclosed to leadership. Three of these (U-05, U-10, U-12) involve personal devices or personal accounts, meaning organisational data is leaving through channels with no contractual, technical, or procedural controls.

Side-channel pattern: U-12 was surfaced during contradiction testing. The staff member initially reported no AI use. When asked specifically about phone-based tools and image uploads, they disclosed photographing internal planning whiteboards and uploading the images to ChatGPT for structured summaries. The whiteboards contained client project names, budget figures, and staff allocation data. This data now sits in a third-party system under consumer terms of service.

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Exposure Classification

Each use case is assessed across four dimensions: data sensitivity, external impact, decision consequence, and review discipline.

Ref	Use	Data	External	Decision	Review	Class.
U-01	Blog drafting	Low	Low	Low	Present	Proceed
U-02	Proposal drafting	Med	High	Med	Partial	Conditions
U-03	Contract research	Low	None	Low	Present	Proceed
U-04	Document review	Med	None	Med	Present	Proceed
U-05	Drafts via personal acct	High	None	High	Absent	Stop
U-06	Job descriptions	Low	Med	Low	Present	Proceed
U-07	Resume screening	High	Med	High	Absent	Stop
U-08	Forecast modelling	Med	None	Med	Partial	Conditions
U-09	Board paper drafting	High	None	High	Present	Conditions
U-10	Meeting recording (personal)	High	None	Med	Absent	Stop
U-11	Process docs	Low	None	Low	Present	Proceed
U-12	Whiteboard photo upload	High	None	Med	Absent	Stop
U-13	Client email drafting	Med	High	Med	Partial	Conditions
U-14	Complaint responses	High	High	High	Absent	Conditions
U-15	Code generation	Low	None	Low	Present	Proceed
U-16	Security policy drafting	Med	None	Med	Present	Proceed

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Control Baseline

Each identified use is classified as Proceed, Proceed with Conditions, or Stop. Classifications are immediately actionable.

Proceed

Ref	Use Case	Rationale
U-01	Blog drafting	Low-sensitivity, internally reviewed.
U-03	Contract research	Internal research only. Not client-facing.
U-04	Document review	Embedded in licensed platform with review controls.
U-06	Job descriptions	HR lead reviews all output before posting.
U-11	Process documentation	Internal use. Reviewed before distribution.
U-15	Code generation	Developer-reviewed. Code review already in place.

Ref	Use Case	Rationale
U-16	Security policy drafting	Internal use. CISO reviews all output.

Proceed with Conditions

Ref	Use Case	Required Conditions
U-02	Proposal drafting	Client names, project details, and commercial terms must not be entered. Drafts reviewed by senior manager before inclusion in client-facing documents.
U-08	Forecast modelling	AI-generated models labelled as draft. Final models require Finance Director sign-off. No individual salary or compensation data as input.
U-09	Board paper drafting	No undisclosed financial data, strategic plans, or M&A; information. Output reviewed by CFO or Company Secretary before board distribution.
U-13	Client email drafting	Output reviewed before sending. No client personal information, account numbers, or complaint details entered as prompts.
U-14	Complaint responses	Immediate condition: all AI-drafted complaint responses must be reviewed by a senior manager before sending. Client data must not be entered into browser-based AI tools. Transition to approved enterprise tool with DPA within 60 days or reclassify as Stop.

Stop

Ref	Use Case	Rationale and Required Action
U-05	Draft contracts via personal account	A member of the legal team is running draft contracts through a personal ChatGPT account. The data is processed under consumer terms of service with no organisational control, no data processing agreement, and no audit trail. Contract content includes client names, commercial terms, and liability clauses. Stop immediately. Legal AI use must occur through an enterprise-licensed tool with a DPA, or not at all.
U-07	Resume screening	Candidate personal data (names, addresses, protected attributes) is being entered into a browser-based LLM with no DPA. No human review of screening output. Stop immediately. Resume screening may only resume with an approved enterprise tool, a data processing agreement, and mandatory human review of all output.
U-10	Meeting recording on personal device	A staff member is recording client meetings using a personal phone, then uploading the audio to Otter.ai via a personal account for transcription. The recordings contain client names, project scope, commercial terms, and internal staffing discussions. The data is stored on a personal device and processed under Otter.ai's consumer terms. The organisation has no visibility, no consent mechanism, and no deletion capability. Stop immediately. Meeting transcription must use an organisation-controlled tool with participant consent and a data processing agreement.
U-12	Whiteboard photo uploads	A staff member is photographing internal planning whiteboards with a personal phone and uploading the images to ChatGPT for structured summaries. The whiteboards contain client project names, budget figures, resource allocation, and strategic planning notes. This was surfaced through contradiction testing: the staff member initially reported no AI use. Stop immediately. No organisational data should be captured on personal devices and processed through consumer AI tools. If structured summaries are needed, use an approved internal tool with organisational data controls.

Pattern: Three of the four Stop cases (U-05, U-10, U-12) share a common structure. Organisational data leaves through a personal device or personal account, is processed under consumer terms of service, and is stored in a system the organisation cannot access, audit, or delete from. This is not a technology problem. It is a control absence. The data has already left.

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Summary Position

Total AI use cases identified	16
Previously undisclosed	7 (44%)
Involving personal devices or accounts	3
Classified: Proceed	7
Classified: Proceed with Conditions	5
Classified: Stop	4
Functional areas with AI use	6 of 8
Uses with no human review	5
Uses involving client data	7
Approved-use policy in place	No
Central AI register in place	No

AI is operational across multiple functions. The immediate risk is not AI adoption. It is the absence of visibility, classification, and control. Four uses should stop immediately. Three involve data that has already left the organisation through personal devices and consumer AI accounts. The organisation needs an approved-use policy, a central register, a review discipline, and a clear position on personal-device use with organisational data.

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Recommended Next Steps

Immediate (Week 1)

Cease U-05 (contracts via personal account), U-07 (resume screening), U-10 (personal meeting recordings), and U-12 (whiteboard photo uploads). Communicate Stop classifications to relevant function heads with rationale. Issue interim guidance on personal-device use with organisational data.

Short-term (Weeks 2–4)

Implement conditions for U-02, U-08, U-09, U-13, and U-14. Draft and circulate an interim approved-use policy covering both corporate and personal-device channels. Designate AI usage owner at leadership level. Begin evaluation of enterprise-licensed AI tools with data processing agreements for the use cases currently classified as Stop.

Medium-term (Months 2–3)

Formalise the AI use register as a living management document. Establish quarterly review cadence. Conduct a targeted follow-up on personal-device use patterns across remaining functions not covered in the initial intake.

Structural Assessment

If the organisation is considering production-scale AI deployment, vendor integration, or significant capital allocation to AI initiatives, a full structural assessment is recommended. The Lumen & Lever Structural Sprint provides board-grade governance across seven structural pillars, including lifecycle control, cost modelling, and override capability.

This specimen document illustrates the structure and content of a completed AI Usage Control Baseline. Actual engagement outputs are tailored to the organisation's specific environment, tools, roles, and risk profile.

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