



RUNNING EXAMPLE

Rhena sweeps its undeclared uses in September 2026, before ANNA's mandate. 214 uses surfaced in 5 weeks, across 28 countries.

1 THE RULE · LOOK FOR THE USAGE, NOT THE CULPRIT

WHY USAGE HIDES

Someone who saves 2 hours a day does not give it up because a memo forbids it, they stop mentioning it. The sweep therefore runs with no sanction announced, otherwise it measures people's caution rather than their practice.

WHAT IS MEASURED

Three things only: which data leaves the organisation, which act reaches a third party unreviewed, and which work already depends on a tool nobody maintains.

2 WORKED EXAMPLE · RHENA · SEPTEMBER 2026 SWEEP

USAGE SURFACED	WHO	DATA EXPOSED	DECISION
Drafting refusal letters in a consumer assistant	34 handlers, 6 countries	Name, address, amount and grounds for refusal	Stopped, replaced by the approved tool
Summarising loss-adjuster reports	Home claims unit	The full report, at times health material	Stopped, non-delegable zone (ACF-O4, part A)
Translating policy wordings	Legal team	No personal data	Kept, entered in the register
Analysing complaint verbatims	Quality	Pseudonymised verbatims	Kept, on condition of anonymised export
Screening job applications	2 recruiters, US subsidiary	CVs, sensitive data	Stopped, non-delegable zone

3 CHECK WHEN RE-READING

THE FIGURE THAT MATTERS

It is not the number of tools found, it is the number of uses stopped with nothing to replace them. At Rhena, 9 out of 214, and it took three months to replace them because an approved tool has to be approved in 28 countries and not in one.

THE FREQUENCY

The sweep is repeated, because usage re-forms. A single sweep gives a snapshot; two give a trend, which is the only useful thing.

Banning without offering an alternative does not remove the usage, it moves it out of sight.