GUIDE 01 · PUBLISHED APRIL 2026 · 15-MIN READ

# The Pre-Copilot Security *Checklist.*

23 critical fixes every UK mid-market tenant needs before switching on Microsoft Copilot — and the 90-day remediation plan that makes it safe.

23 CHECKS

5 PILLARS

90-DAY PLAN

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MICROSOFT SOLUTIONS PARTNER · UK

INSIDE THIS GUIDE

# A working manual, not a *white-paper.*

Every section ends with a pass/fail test, a remediation action and the exact Microsoft tool that applies. Work top to bottom. Score as you go.



*"Did you assess data governance before you switched Copilot on?"*

— WHAT YOUR AUDITOR, ICO OR BOARD WILL EVENTUALLY ASK

## WHO THIS IS FOR

Heads of IT, CISOs, DPOs and COOs at UK organisations of **50–500 staff** who have bought Microsoft 365 Copilot licences — or are about to — and want to deploy AI without triggering an ICO reportable incident.

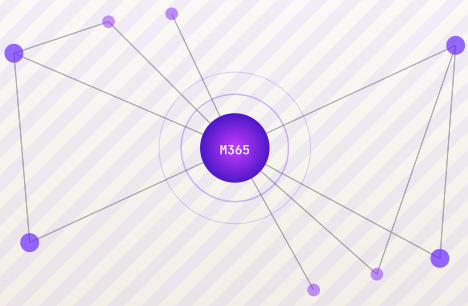
## WHAT YOU'LL HAVE AT THE END

01 A red / amber / green score across 23 controls.

02 A prioritised 90-day remediation plan.

03 A defensible answer for your board, auditor or the ICO.

FIG. 01 · TENANT PERMISSIONS SPRAWL



00 — THE OPENING MOMENT

# What happens the day you *switch on* Copilot.

A junior analyst in the finance team opens Microsoft 365 Copilot on a Tuesday morning. Because her manager told her to "try it for the forecast", she types in a reasonable question:

> PROMPT · 09:14 TUE
>
> **"Summarise the salary changes in the 2026 compensation review."**

Eleven seconds later, Copilot returns a clean three-paragraph summary. It names executives. It cites exact numbers. It references a SharePoint file called *"2026 Comp Review — CONFIDENTIAL — FINAL.xlsx"* that she never should have been able to see.

Nobody got hacked. No password was leaked. The file was simply in a SharePoint site that was shared with "Everyone in the organisation" eighteen months ago, when the HR director needed a quick link for a consultant. That consultant left. The link stayed.

> THE UNCOMFORTABLE TRUTH
>
> Copilot did exactly what Microsoft designed it to do — operate on your existing permissions model. The problem is almost nobody's existing permissions model is fit to be operated on by a tool this fast.

THE SCALE IN THREE NUMBERS

**802k**

FILES EXPOSED IN THE AVERAGE TENANT

Per 2025 analysis of 550m records across live Microsoft 365 tenants — files reachable via broken permissions or oversharing.

**40%**

OF COPILOT ROLLOUTS DELAYED 90+ DAYS

Gartner survey of 132 IT leaders — paused the project after discovering what Copilot could actually see.

**3.3%**

PAID COPILOT CONVERSION RATE

15m paid seats against 450m M365 commercial subscribers. The gap between "bought" and "safely using" is where every UK SME is sitting.

01 — THE FRAMEWORK

# Copilot readiness is *five* problems, not one.

23 CHECKS
5 PILLARS
90-DAY PLAN

Each pillar compounds the next at AI speed. Fix them in this order — and only in this order.

| | | |
|---|---|---|
| 01 | **Permissions**<br>Who can access what today. 80% of Copilot incidents start here. | 5 CHECKS |
| 02 | **Classification**<br>Which files are labelled sensitive. | 4 CHECKS |
| 03 | **Identity & Access**<br>Who can sign in — and from where. | 4 CHECKS |
| 04 | **SharePoint & OneDrive**<br>Where the sharing sprawl actually lives. | 5 CHECKS |
| 05 | **Governance & Monitoring**<br>What you can prove, to the board or the ICO. | 5 CHECKS |

THE CLOUDBLISS RULE OF THUMB

Every pillar you skip **doubles** the likelihood Copilot surfaces something it shouldn't in the first 30 days. Skip two and it becomes near-certain.

PILLAR 01 OF 05 · 5 CHECKS

# Close the blast radius before you *light the fuse.*

This is where 80% of Copilot incidents originate. If Anne in marketing can see the salary spreadsheet today, Copilot can read it out loud for her tomorrow. Nothing else in this checklist matters if you skip this pillar.

## 1.1 Audit "Everyone except external users" permissions across the tenant.

The single most common oversharing pattern in M365. Designed as a "shortcut" for internal collaboration — Copilot treats it as an open door across every staff member, including your newest junior starter.

**PASS / FAIL**
Run the SharePoint Advanced Management "Permissions Inspection" report. Count sites containing this group above read-only. Anything above zero on sites with HR, finance, legal, M&A or board material is a fail.

**IF YOU FAIL**
Replace broad group access with named security groups mapped to specific roles. Do this site by site, starting with the highest-risk content.

**MS TOOL**
SharePoint Advanced Management (included in M365 E3/E5 from March 2025) + Microsoft Purview DSPM for AI.

## 1.2 Identify and remediate orphaned sharing links.

Every "Anyone with the link" from the past five years is still live unless you explicitly expired it. Links to departed consultants and ex-employees still work — any forwarded click inherits their permissions.

**PASS / FAIL**
Run a SharePoint report of anonymous / "Anyone" links older than 90 days. More than 200 is a fail.

**IF YOU FAIL**
Expire all Anonymous links globally via tenant policy. Replace with "Specific people" links. Rotate link expiry to 30 days.

**MS TOOL**
SharePoint Admin → Sharing Policies + Purview Data Lifecycle Management.

## 1.3 Review privileged-role assignments (Global, Exchange, SharePoint Admin).

Microsoft's guidance is fewer than 5 Global Admins in a mid-sized tenant. We regularly audit tenants with 12–20. Every admin is a potential Copilot escalation path if their account is compromised.

**PASS / FAIL**
Export Entra ID role assignments. Count Global Admins. Over 5 for a 200-seat tenant is a fail. Also flag any break-glass accounts without MFA.

**IF YOU FAIL**
Demote to least-privileged roles. Move reporting admins to "Global Reader". Use PIM (Privileged Identity Management) for just-in-time elevation.

**MS TOOL**
Microsoft Entra Privileged Identity Management + Secure Score.

## 1.4 Decommission orphaned M365 Groups and Teams.

Abandoned Teams and M365 Groups are the landfill of the tenant. Files, chat history, planner boards — all invisible to the IT team, all indexed by Copilot. Our average audit finds 30–60% of Groups are inactive.

**PASS / FAIL**
Pull a report of M365 Groups with zero activity in the last 180 days. Anything above 20% of total Groups is a fail.

**IF YOU FAIL**
Enable M365 Group Expiration Policy with renewal workflow. Archive and delete stale Groups. Migrate active content to managed Teams.

**MS TOOL**
Microsoft 365 Admin Centre → Groups → Expiration Policy.

## 1.5 Lock down external guest access before day one.

Copilot does not distinguish between an internal colleague and a guest with a work email. If a guest has read access to a sensitive site, Copilot serves their prompts the same way it serves yours.

**PASS / FAIL**
Run Entra ID guest user inventory. Flag any guest with no sign-in activity in 60+ days, and any guest with access to sites tagged Confidential or Highly Confidential.

**IF YOU FAIL**
Apply Conditional Access policies restricting guest access. Enable Entra ID Access Reviews quarterly. Remove unused guest accounts.

**MS TOOL**
Entra ID External Identities + Conditional Access + Access Reviews.

PILLAR 02 OF 05 · 4 CHECKS

# Teach your tenant what *"sensitive"* actually means.

Copilot is not magic. It treats a payroll spreadsheet and a lunch menu identically unless you have told it otherwise. Sensitivity labels are the instruction set — most UK mid-market tenants have never deployed them properly.

## 2.1 Deploy a tiered sensitivity label scheme.

Three labels is the sweet spot: Public, Internal, Confidential. Four is acceptable (add Highly Confidential for HR/legal/M&A). Five or more confuses staff and collapses adoption.

**PASS / FAIL**
Open Purview Information Protection. Count your published labels. Zero published = fail. 6+ published = fail for a different reason.

**IF YOU FAIL**
Define the scheme in a one-page document, publish via a pilot group of 50, then expand. Auto-apply labels to highest-risk files using trainable classifiers.

**MS TOOL**
Microsoft Purview Information Protection + Data Classification Service.

## 2.2 Apply auto-labelling rules to the highest-risk content types.

Manual labelling never reaches 100% adoption. Auto-labelling does — and it is the only way to ensure new documents created after Copilot goes live are correctly classified from day one.

**PASS / FAIL**
List active auto-labelling policies. Zero policies = fail. Minimum is three: financial records, HR/payroll, client-contract data.

**IF YOU FAIL**
Deploy built-in sensitive information types (SITs) for UK GDPR, NHS numbers, payment card data. Test on a known dataset before enabling at scale.

**MS TOOL**
Purview Auto-Labelling Policies + trainable classifiers (E5 Compliance).

## 2.3 Enable Copilot-specific label exclusions.

A lesser-known setting: you can explicitly exclude documents with a given label from being processed by Copilot at all. For the most sensitive content, this is the safest option — no matter what someone prompts, Copilot will refuse.

**PASS / FAIL**
Open Purview → Information Protection → Copilot. Check whether any label is configured with "Exclude from Copilot processing". If all labels are included, fail (for regulated sectors).

**IF YOU FAIL**
Apply "Exclude from Copilot processing" to your top sensitivity label. Typically covers 3–8% of corpus, eliminates 90%+ of downside risk.

**MS TOOL**
Microsoft Purview + Microsoft 365 Copilot policy controls.

## 2.4 Train the labels: run a 30-day pilot before tenant-wide rollout.

Labels that are wrong are worse than no labels at all. A misapplied "Internal" label on a payroll file tells Copilot that file is safe to quote. Every rollout needs a pilot.

**PASS / FAIL**
Check the audit log for labelling errors and user label-override events in the last 30 days. Override rate above 15% means your scheme is not understood.

**IF YOU FAIL**
Run a 30-day pilot with 50 users across HR, Finance and one client-facing team. Survey confusion points. Refine scheme before full rollout.

**MS TOOL**
Microsoft Purview Activity Explorer + Audit Log.

PILLAR 03 OF 05 · 4 CHECKS

# Lock the front door before you give the *keys* to AI.

Copilot takes identity assumptions at face value. If your Conditional Access rules allow legacy authentication, a compromised password is a Copilot session. If MFA is optional, so is your oversharing problem.

## 3.1 Enforce MFA on every user, including break-glass and service accounts.

Microsoft's own data shows MFA blocks 99.2% of account compromise attempts. Yet we still audit tenants where 15–25% of users have MFA disabled — contractors, executive assistants, shared accounts. These are the accounts attackers target first.

**PASS / FAIL**
Pull Entra ID sign-in report. Filter by "MFA not enforced". Any number above zero for active users is a fail.

**IF YOU FAIL**
Enable Security Defaults or build a Conditional Access policy requiring MFA for all users. Use phishing-resistant MFA (FIDO2, passkeys) for privileged roles.

**MS TOOL**
Entra ID Conditional Access + Authentication Methods policy.

## 3.2 Block legacy authentication protocols.

Basic Auth, IMAP, POP3 and SMTP AUTH bypass MFA entirely. If a single legacy protocol is still enabled, your MFA policy is theatrical. We still find them switched on in 60% of mid-market audits.

**PASS / FAIL**
Check Entra ID → Sign-in logs → Legacy Authentication filter. Any sign-ins in the last 30 days is a fail.

**IF YOU FAIL**
Build a Conditional Access policy blocking legacy authentication. Migrate any remaining line-of-business apps to modern auth.

**MS TOOL**
Conditional Access + Authentication Methods + Exchange Online modern-auth enforcement.

## 3.3 Enforce device compliance for Copilot access.

A user signing in from a personal, unpatched laptop has access to the same Copilot as a user on a managed, encrypted device. Compliance-based Conditional Access closes that gap — and is a Cyber Essentials Plus requirement.

**PASS / FAIL**
Check for a Conditional Access policy requiring "device marked as compliant" for access to M365 apps. If not, fail.

**IF YOU FAIL**
Enrol all primary devices in Intune. Define a compliance policy (BitLocker, minimum OS, antivirus). Gate Copilot access behind compliance.

**MS TOOL**
Microsoft Intune + Conditional Access + Defender for Endpoint.

## 3.4 Configure named locations and risk-based sign-in policies.

Most UK SMEs operate from 1–3 offices and a handful of home IPs. Sign-ins from Lagos, Moscow or Tehran are rarely legitimate. Risk-based Conditional Access stops these automatically.

**PASS / FAIL**
In Entra ID, check for a Conditional Access policy triggered by "high sign-in risk" that blocks access or requires password reset + MFA. If not, fail.

**IF YOU FAIL**
Enable Entra ID Protection (P2). Configure user-risk and sign-in-risk policies. Block impossible-travel events automatically.

**MS TOOL**
Entra ID Protection (P2) + Conditional Access.

PILLAR 04 OF 05 · 5 CHECKS

# Clean the corpus Copilot *reads.*

Copilot's answers are only as good as the data it reads. A SharePoint full of obsolete files, duplicates and abandoned sites produces hallucinations, contradictions and dangerous summaries. The cleanup pays for itself in output quality alone.

## 4.1 Archive inactive SharePoint sites.

The typical mid-market tenant has 200–2,000 SharePoint sites. 30–40% are inactive. These sites are pure noise to Copilot and pure risk to your permissions model.

**PASS / FAIL**
Run the SharePoint site activity report. Count sites with zero activity in 12 months. If >30%, fail.

**IF YOU FAIL**
Deploy SAM's inactive-site policy: auto-archive after 180 days of inactivity, owner notification, 30-day recovery window.

**MS TOOL**
SharePoint Advanced Management (SAM).

## 4.2 Lock down the default "Everyone" group on new sites.

SharePoint ships with Everyone granted visitor access on some default templates. Every site created without explicit scoping inherits this. One click, weeks of exposure.

**PASS / FAIL**
Check your default site creation policy. If Everyone has any default permissions, fail.

**IF YOU FAIL**
Remove Everyone from all default site permissions. Replace with a "NewSite-Owners" security group containing specific named owners.

**MS TOOL**
SharePoint Admin Centre → Site creation defaults + PowerShell governance scripts.

## 4.3 Disable OneDrive personal sharing of corporate content.

OneDrive is the shadow SharePoint. When employees struggle with permissions in SharePoint, they copy the file to OneDrive and share from there. Copilot indexes OneDrive identically — including whatever your user has shared externally.

**PASS / FAIL**
Query the OneDrive sharing report for external sharing events. If there are active external shares on corporate content, investigate each.

**IF YOU FAIL**
Disable external sharing from OneDrive by policy. Permit collaboration only through SharePoint Team Sites with managed permissions.

**MS TOOL**
OneDrive sharing policies + DLP policies for external data transfer.

## 4.4 Remove personal accounts and unsanctioned apps from Teams and SharePoint.

Shadow IT apps — Trello boards, Dropbox shares, personal Gmail — leak corporate context into personal cloud services. The oversharing they create is absorbed back into the tenant when files are re-uploaded.

**PASS / FAIL**
Run Defender for Cloud Apps (Cloud App Discovery). Count unsanctioned apps used in the last 30 days. If >20, you have a shadow IT problem that will scale with Copilot.

**IF YOU FAIL**
Block unsanctioned apps via Conditional Access. Publish a sanctioned-app list. Remove personal OneDrive sync on corporate devices.

**MS TOOL**
Defender for Cloud Apps + Entra ID Conditional Access.

## 4.5 Apply retention and deletion policies to reduce data sprawl.

Files that should have been deleted ten years ago are still in the index. Ex-employee email archives, old legal matters, closed-account HR records. Every one of them is live Copilot context.

**PASS / FAIL**
Count your Purview retention policies. Zero published = fail. If policies cover only email and not SharePoint/Teams, fail.

**IF YOU FAIL**
Publish three retention policies at minimum: default 7-year retention, legal hold, HR confidential (longer). Auto-delete eligible content after expiry.

**MS TOOL**
Microsoft Purview Data Lifecycle Management.

PILLAR 05 OF 05 · 5 CHECKS

# Prove it is working, *every day.*

The first four pillars are the build. This pillar is the run. Without monitoring, your Copilot deployment degrades silently — new oversharing, new guests, new sites, new risks. The goal is to make that decay visible.

## 5.1 Enable Purview DSPM for AI.

Data Security Posture Management for AI is Microsoft's newest governance tool. It specifically monitors Copilot interactions and flags unusual data exposures. Included in E5, available as an add-on to E3.

**PASS / FAIL**
Check if DSPM for AI is configured and receiving data. If no dashboards are populated, fail.

**IF YOU FAIL**
Enable DSPM for AI. Configure alert policies for "sensitive data accessed via Copilot by user not authorised". Review the dashboard weekly for the first 90 days.

**MS TOOL**
Microsoft Purview DSPM for AI.

## 5.2 Configure Copilot usage analytics and anomaly detection.

You cannot improve what you do not measure. Copilot usage analytics show which teams are adopting, where prompts are failing, and where governance incidents are being triggered.

**PASS / FAIL**
Check Viva Insights → Copilot Dashboard. If not configured, fail.

**IF YOU FAIL**
Enable Copilot Dashboard. Set weekly review cadence with Head of IT and a department champion. Track activation, intensity, top prompt patterns.

**MS TOOL**
Viva Insights Copilot Dashboard + Power BI reporting.

## 5.3 Set up alerts for "sensitive data surfaced by Copilot".

Purview can alert on specific patterns: sensitive labels accessed via Copilot, anonymous-link content referenced in a Copilot response, or mass prompts about restricted topics (salaries, M&A, redundancy).

**PASS / FAIL**
Open Purview Alert Policies. Count active Copilot-related alerts. If zero, fail.

**IF YOU FAIL**
Build at minimum: (a) "Highly Confidential label accessed via Copilot", (b) "Anonymous link content cited in Copilot response", (c) "Bulk prompts containing restricted keywords".

**MS TOOL**
Purview Alert Policies + Microsoft Sentinel integration.

## 5.4 Document your Copilot governance for audit, ICO and board.

If asked by the ICO, your auditor or the board: "Did you assess data governance before deploying Copilot?", you need a one-page, signed, dated document. This is no longer optional under UK GDPR Article 35.

**PASS / FAIL**
Check if you have a dated Copilot DPIA signed by the DPO. If not, fail.

**IF YOU FAIL**
Write (or commission) a DPIA covering purpose, scope, data subjects, legal basis, risks, mitigations, residual risk and DPO sign-off. Update quarterly.

**MS TOOL**
Microsoft DPIA template + internal policy library.

## 5.5 Establish a quarterly Copilot governance review.

Everything degrades without review. New joiners, new sites, new guests, new sharing. The only defence is a recurring review cadence. Quarterly is the minimum for a 200-seat tenant.

**PASS / FAIL**
Is there a standing quarterly Copilot governance review booked with IT, Compliance, DPO and a business sponsor? If not, fail.

**IF YOU FAIL**
Set a recurring 90-minute quarterly: oversharing delta, new guest count, incident log, label application rate, user-risk events, and one remediation commitment per quarter.

**MS TOOL**
Cloudbliss Quarterly Roadmap Review service (or internal calendar invite with an accountable owner).

07 — YOUR READINESS SCORECARD

# Go back through the 23 checks.
*Tick. Score. Decide.*

## PILLAR-BY-PILLAR SCORE

| PILLAR | RED | AMBER | GREEN | SCORE |
|---|---|---|---|---|
| **01 · Permissions**<br>5 checks | 0–1 · DO NOT DEPLOY | 2–3 · Critical gaps | 4–5 · Ready | ___ / 5 |
| **02 · Classification**<br>4 checks | 0–1 · DO NOT DEPLOY | 2 · High risk | 3–4 · Ready | ___ / 4 |
| **03 · Identity & Access**<br>4 checks | 0–1 · DO NOT DEPLOY | 2 · High risk | 3–4 · Ready | ___ / 4 |
| **04 · SharePoint & OneDrive**<br>5 checks | 0–1 · Very high risk | 2–3 · Manageable | 4–5 · Ready | ___ / 5 |
| **05 · Governance**<br>5 checks | 0–1 · Flying blind | 2–3 · Limited vis. | 4–5 · Ready | ___ / 5 |
| **Total** | OUT OF 23 CHECKS | | | ___ / 23 |

## WHAT YOUR TOTAL MEANS

### 0–10 / 23 — CRITICAL

Do not switch on Copilot. Your tenant will expose sensitive data within days. Every quarter of delay, the problem grows. A full readiness assessment is urgent.

### 11–17 / 23 — HIGH RISK

Remediate before expanding pilot. You can run a controlled pilot with a small trusted group while fixing gaps. Do not expand beyond 50 users until you reach 18+.

### 18–23 / 23 — READY

Ready for full Copilot rollout. You are in the top 10% of tenants we audit. Focus on adoption, training and measuring ROI. Repeat this scorecard quarterly to prevent drift.

DATE YOUR SCORECARD

Scored by: _____ · Date: ___ / ___ / 2026 · Next review: ___ / ___ / 2026

08 — THE 90-DAY REMEDIATION PLAN

# Not a six-month consulting engagement.

*A plan that ships.*

If you scored below 18, this is the plan. Designed to be executable by a small internal IT team with specialist support.

WEEKS 1–2 — 01

## Discover & stop the bleeding

- → Run SAM permissions reports across all sites.
- → Disable anonymous link creation tenant-wide.
- → Enforce MFA on every account (incl. break-glass, service).
- → Block legacy auth via Conditional Access.
- → Flag top 20 highest-risk sites for immediate review.

WEEKS 3–6 — 02

## Clean up the corpus

- → Remediate the top 20: scope "Everyone" to named groups, review external sharing, apply labels.
- → Publish the 3-tier sensitivity label scheme.
- → Configure auto-labelling for payroll, M&A, contracts.
- → Archive / delete inactive sites and M365 Groups.
- → Run first Entra Access Review on guest accounts.

WEEKS 7–10 — 03

## Build governance in

- → Enable Purview DSPM for AI + Viva Insights Copilot Dashboard.
- → Configure alerts for sensitive-data-via-Copilot events.
- → Publish retention and deletion policies.
- → Write (or commission) the Copilot DPIA.
- → Pilot Copilot with 25–50 trusted users, monitor anomalies.

WEEKS 11–12 — 04

## Rollout & cadence

- → Full rollout with usage reporting baseline established.
- → First quarterly Copilot governance review booked.
- → Change control: "no new sites without security group assignment".
- → Staff training: prompt library, data-handling do's & don'ts.
- → Publish "how to report a Copilot incident" runbook.

DAY 01 — DAY 14 — DAY 42 — DAY 70 — DAY 90 · COPILOT LIVE

09 — WHAT TO DO NEXT

# You have *three* options from here.

OPTION 01 **DIY**

## Do it yourself.

If you have a strong internal IT and security team with Purview, SAM and Entra expertise in-house, work through the 23 checks in order and book a quarterly review cadence. This document is yours to use.

Best for: in-house security teams with Microsoft E5.

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RECOMMENDED

OPTION 02 **FREE**

## A second pair of eyes.

Book a free 30-minute Copilot Readiness Call. We'll talk through your scorecard, flag the 2–3 highest-risk findings specific to your tenant, and tell you candidly whether you need a full assessment or just a few focused fixes.

Best for: teams that want a sanity check before spending.

CLOUDBLISS.CO.UK/COPILOT-READINESS-CALL

OPTION 03 **£1,400**

## Full Readiness Assessment.

Fixed-price. A scored report across all 5 pillars, a prioritised 90-day remediation plan, and a 1-hour executive debrief. Typical turnaround: 1 week. Most tenants find 3+ critical risks they didn't know about.

Best for: boards that need a defensible, audit-ready answer.

CLOUDBLISS.CO.UK/COPILOT-READINESS-ASSESSMENT

WHY CLOUDBLISS

UK Microsoft Solutions Partner specialising in Microsoft 365, Power Platform and Copilot for UK mid-market organisations. Our founding team brings **Lockheed Martin, Leidos and MoD-grade** security discipline to SME-scale budgets.

- MS SOLUTIONS PARTNER
- CYBER ESSENTIALS
- GDPR-ALIGNED
- 200+ MIGRATIONS

NEXT IN THE COPILOT READINESS SERIES

# Guide 02 — *Copilot Adoption* Playbook.

How to build a prompt library, train champions, and get to 60%+ activation in 30 days — without the governance headaches from Guide 01.

COMING Q3 2026

*Enterprise discipline. Startup-speed delivery.*

— CLOUDBLISS · DEFENCE & ENTERPRISE BACKGROUND, SME-SCALE ECONOMICS

TRACK RECORD

**200+**

UK migrations delivered on time, on budget, zero data loss.

FROM

**£1,400**

Fixed-price Copilot Readiness Assessment.

TURNAROUND

**1 wk**

Typical scored-report delivery. Then a 90-day plan.

CONSULTATION

**30 min**

Free, no obligation, no sales pitch.

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cloudbliss.co.uk
hello@cloudbliss.co.uk
linkedin.com/company/cloudbliss