

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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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.

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

WHAT YOUR AUDITOR, THE ICO OR BOARD WILL EVENTUALLY ASK

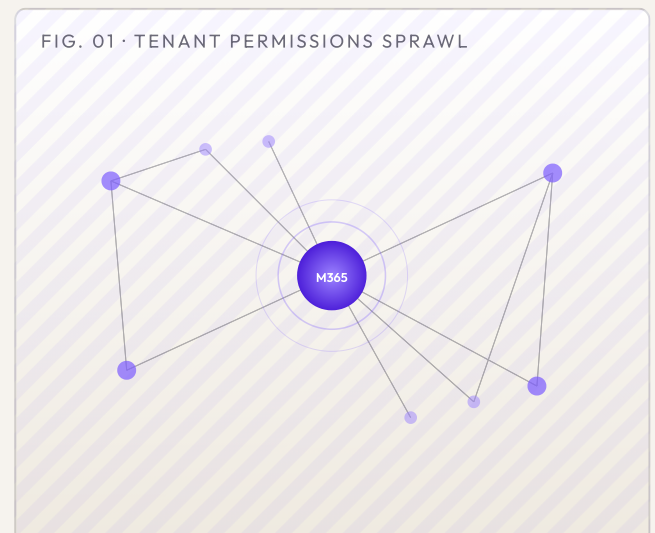
WHO THIS IS FOR

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: it operated 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; many 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

Who can access what today. 80% of Copilot incidents start here.

5 CHECKS

02

Classification

Which files are labelled sensitive.

4 CHECKS

03

Identity & Access

Who can sign in, and from where.

4 CHECKS

04

SharePoint & OneDrive

Where the sharing sprawl actually lives.

5 CHECKS

05

Governance & Monitoring

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, and 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 RED	AMBER AMBER	GREEN GREEN	SCORE
01 · Permissions 5 checks	0-1 · DO NOT DEPLOY	2-3 · Critical gaps	4-5 · Ready	___/5
02 · Classification 4 checks	0-1 · DO NOT DEPLOY	2 · High risk	3-4 · Ready	___/4
03 · Identity & Access 4 checks	0-1 · DO NOT DEPLOY	2 · High risk	3-4 · Ready	___/4
04 · SharePoint & OneDrive 5 checks	0-1 · Very high risk	2-3 · Manageable	4-5 · Ready	___/5
05 · Governance 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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OPTION 02

FREE

A second pair of eyes.

Book a free 30-minute consultation with a founder, not a sales queue. We'll talk through your scorecard, flag the two or three 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.

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OPTION 03

**£4,800–
£7,600**

Copilot Readiness Assessment.

A fixed-price, 14-day review across oversharing, sensitivity and labels, search and grounding scope, and governance posture. You get a 15 to 20-page report, a top-50 overshare register, a label rollout plan and a pilot cohort design. We have never run this audit without finding at least one document Copilot would have surfaced to the wrong audience.

Bands: ≤100 £4,800 · 100–500 £6,200 · 500–1,000 £7,600.

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WHY CLOUDBLISS

A UK Microsoft consultancy specialising in Microsoft 365, Power Platform and Copilot for mid-market firms of 50 to 500 staff. Our founding team brings **Lockheed Martin, Leidos and MoD-grade** security discipline to mid-market budgets. Fixed scope, fixed price: the quote is the cost.

UK MICROSOFT CONSULTANCY

CERTIFICATIONS UNDERWAY

40+ ENGAGEMENTS

FOUNDER-LED

NEXT IN THE COPILOT READINESS SERIES

Guide 02: Copilot Adoption Playbook.

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

COMING Q3 2026

*Enterprise
discipline.
Startup-speed
delivery.*

CLOUDBLISS · DEFENCE AND ENTERPRISE
BACKGROUND, MID-MARKET ECONOMICS

TRACK RECORD

40+

Microsoft engagements delivered for UK mid-market firms.

FROM

£4,800

Fixed-price Copilot Readiness Assessment.

TURNAROUND

14 days

Scored report, then a prioritised 90-day plan.

CONSULTATION

30 min

Free, no obligation, no sales pitch.



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