

Is Your Firm Using Microsoft 365 Copilot Responsibly?

A 5-Minute AI Governance Self-Check
for Financial Services



As Copilot adoption expands, so do the questions around how to govern it.

Microsoft 365 Copilot can make it faster and easier for financial services teams to find information and get work done. But as usage grows, firms also need to understand what that means for sensitive information and the people responsible for protecting it.

FINRA has put these questions squarely on the regulatory radar. Its [2026 Annual Regulatory Oversight Report](#) includes an entire section dedicated to GenAI, with specific considerations around supervision, governance, cybersecurity, testing, and ongoing monitoring.

Responsible Copilot use starts with understanding the environment it operates in. That means knowing what Copilot can reach and whether the right protections and expectations are in place.

This checklist can help gauge where your firm stands today and identify areas that may need attention as Copilot becomes a bigger part of everyday work.

Self-Check Topics

- Strategic Alignment
- Data & Information Management
- Governance & Protection
- Adoption & Change Management
- **Bonus Prompt:** Chart Your Copilot Course

How It Works

For each question, choose the option that best reflects your current state. Tally your section scores to see where you're well positioned and where there may be opportunities to improve.

There are no perfect scores here. The goal is to better understand your firm's strengths and weaknesses, so you can make more informed decisions about Copilot across your organization.

Scoring Guide

2 pts

Strong

1 pt

Some progress

0 pts

Needs attention

***Not sure**

0 points, but great discussion starters

6 points max

Strategic Alignment

Why this matters

A responsible approach to AI starts with a clear understanding of business goals, risk tolerance, and who stands to benefit. This section helps assess whether Copilot is aligned with your firm's priorities and actual business needs.

What your "Strategic Alignment" score tells you

A high score suggests shared internal direction around where and how Copilot can deliver value. A lower score could mean priorities or intended applications aren't clearly defined yet.

1. Where is the pressure to adopt AI tools like Copilot coming from?

- ☒ 2 Org-wide momentum
- ☐ 1 Department-level demand / Leadership interest
- ☐ 0 No pressure yet
- ☐ * Not sure

2. Have you identified business use cases where Copilot could deliver value?

- ☒ 2 Yes – confirmed with stakeholders
- ☐ 1 Drafted, not validated / Exploring ideas
- ☐ 0 Not yet
- ☐ * Not sure what's been explored

3. Have you identified which teams or roles should be prioritized for Copilot?

- ☒ 2 Yes – priority users have been identified based on business needs
- ☐ 1 Some teams or roles have been identified, but prioritization is still underway
- ☐ 0 No – we haven't determined which users to prioritize
- ☐ * Not sure

Score:

6 points max

Data & Information Management

Why this matters

Copilot works within the data and access structures your firm already has in place. That makes it important to understand who can access sensitive information, what requirements govern your data, and how outdated information is managed.

What your “Data & Information Management” score tells you

A strong score suggests you have good visibility and controls around the information Copilot can access. A lower score may mean existing data risks become harder to manage as Copilot expands how people find and use information.

4. Can you identify Microsoft 365 content that’s accessible to more people than intended?

- ☒ 2 Yes, we regularly identify and address overshared content
- ☐ 1 Some visibility, but reviews are inconsistent or manual
- ☐ 0 No process for identifying overshared content
- ☐ * Not sure

5. Have you documented the data residency or processing requirements that apply to your firm?

- ☒ 2 Yes – requirements are clearly defined and documented
- ☐ 1 Some awareness, but requirements aren’t fully documented
- ☐ 0 No – we haven’t formally determined what applies
- ☐ * Not sure

6. Do you regularly identify and manage outdated or inactive data?

- ☒ 2 Yes – automated policies manage data based on age or content
- ☐ 1 Yes – primarily through manual reviews
- ☐ 0 No process in place
- ☐ * Not sure

Score:

8 points max

Governance & Protection

Why this matters

Effective AI governance depends on strong security and compliance controls. As Copilot becomes more widely adopted, firms need to ensure sensitive information remains protected and access is managed appropriately.

What your “Governance & Protection” score tells you

A strong score suggests your existing controls provide a solid foundation for responsible Copilot use. A lower score may mean Copilot could amplify security and compliance risks that are already present in your environment.

7. How confident are you that user permissions are structured and managed properly?

- ☒ 2 Very – permissions are structured and reviewed regularly
- ☐ 1 Somewhat – basic controls exist, but reviews are inconsistent
- ☐ 0 Not confident – permissions are inconsistent or unmanaged
- ☐ * Not sure

8. Are you using data loss prevention (DLP) tools to reduce accidental sharing of sensitive information?

- ☒ 2 Yes – across cloud services and devices
- ☐ 1 Yes – partial coverage
- ☐ 0 No DLP tools in place
- ☐ * Not sure what’s deployed

9. Can your firm identify and classify sensitive information?

- ☒ 2 Yes – automated classification and labeling
- ☐ 1 Yes – primarily manual classification and labeling
- ☐ 0 No classification process or tools
- ☐ * Not sure

10. Can you monitor how users interact with sensitive data?

- ☒ 2 Yes – monitoring and alerts help identify risky or non-compliant activity
- ☐ 1 Partially – activity can be reviewed through logs or manual searches
- ☐ 0 No monitoring process in place
- ☐ * Not sure

Score:

2 points max

Adoption & Change Management

Why this matters

Even the most capable AI tools deliver limited benefits if people aren't prepared to use them effectively. Getting value from Copilot depends on clear expectations and training across the firm.

What your "Adoption & Change Management" score tells you

A high score suggests your firm is prepared to turn Copilot access into business value. A lower score may mean Copilot use is moving faster than the training and support needed to make it worthwhile.

11. Do you have a training or enablement plan for Copilot users?

- ☒ 2 Yes – enablement plan is ready
- ☐ 1 Some planning underway
- ☐ 0 No plan yet
- ☐ * Not sure who owns this

Score:

Your Totals

Strategic Alignment	/ 6
Data & Information Management	/ 6
Governance & Protection	/ 8
Adoption & Change Management	/ 2
Total Readiness Score	 / 22

**Pay attention to your “Not sure” answers. When it comes to Copilot, not knowing can be just as important as identifying a weakness. These answers may reveal important blind spots worth investigating now.*

What Your Total Score Tells You

Your score provides a high-level view of the business, data, governance, and people practices supporting Copilot use. Individual section scores can show you where to focus next.

Total Score	Where You Stand	What It Means
18–22	Solid foundation	Your firm has many of the practices needed to sustain responsible Copilot use. Use section scores to identify opportunities to strengthen your approach over time.
12–17	Room to strengthen	Your firm has made progress, but weaknesses in one or more areas could increase risk or limit the value you get from Copilot. Address any low-score sections first.
0–11	Stronger foundation needed	A low score may signal greater risk as your firm’s use of Copilot grows. Prioritize these areas to strengthen your approach before expanding access any further.

Chart Your Copilot Course

Use your self-check responses to identify priorities and prepare for conversations with IT, compliance, and leadership.

Step 1: Copy the selections you made in this checklist, grouped by section.

Step 2: Paste them into Copilot with this prompt:

You are an expert advisor helping me evaluate how well my financial services firm's current practices support responsible use of Microsoft 365 Copilot. Here are the answers from our self-check:

Strategic Alignment:

- Pressure to adopt AI: *[your answer]*
- Copilot Use cases: *[your answer]*
- Priority users: *[your answer]*

Data & Information Management:

- Overshared Microsoft 365 content: *[your answer]*
- Data residency & processing requirements: *[your answer]*
- Outdated or inactive data: *[your answer]*

Governance & Protection

- User permissions: *[your answer]*
- DLP tools: *[your answer]*
- Sensitive data classification: *[your answer]*
- Monitoring sensitive data activity: *[your answer]*

Adoption & Change Management:

- Copilot training and enablement: *[your answer]*

Based on these details, please:

1. Identify the three highest-priority areas and briefly explain why. Treat “Not sure” responses as areas to investigate rather than making assumptions.
2. Create a short agenda for a discussion with our IT and compliance leads, including the key questions we should resolve.
3. Draft a two-sentence update for executive leadership summarizing where our current approach appears strong and where additional work may be needed.

Ready to Put Your Results to Work?

We can help strengthen your Microsoft 365 environment, navigate governance requirements, and address the priorities identified in your self-check.

[Talk with our experts](#) →



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