



Cyber Essentials Update (Danzell)

Key changes: Willow (v3.2) to
Danzell (v3.3)

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UNDERSTANDING THE DANZELL UPDATE CONTEXT



Key Changes:: Willow (v3.2) to Danzell (v3.3)

- 1. Cloud Scope** Cloud services cannot be excluded from scope. If it stores your data, it's in.
- 2. MFA Auto-Fail** MFA absent on any cloud service where it's available = automatic failure.
- 3. Patching Auto-Fail (A6.4 & A6.5)** Critical/high patches not applied within 14 days = automatic failure for OS, firmware, and applications.
- 4. CE+ Second Sample Failed** device sample triggers a second random test. Second failure revokes your VSA certificate.
- 5. Scoping Rules** —Partial scope exclusions must be justified in writing. Legal entities must be listed with name, address, and company number.
- 6. VSA and Board Declaration** VSA must be locked before CE+ testing begins. Board sign-off now covers ongoing compliance, not just point of assessment.



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CLOUD SERVICES AND MFA



Scope Inclusion

Cloud services are now fully included in the Cyber Essentials scope, which means all relevant security measures must be applied to these services without exception.

MFA Requirements

The absence of Multi-Factor Authentication (MFA) on any cloud service results in an automatic failure of the Cyber Essentials assessment, emphasising the importance of robust authentication methods.



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PATCH MANAGEMENT OVERVIEW



Questions A6.4 and A6.5 are designated as ‘auto-fail’ questions, meaning that non-compliance will lead to automatic failure of the assessment.

- **A6.4:** Are all high-risk or critical security updates and vulnerability fixes for operating systems and router and firewall firmware installed within 14 days of release?
- **A6.5:** Are all high-risk or critical security updates and vulnerability fixes for applications (including any associated files and extensions) installed within 14 days of release?



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IMPROVED SCOPE DEFINITION AND CERTIFICATION TRANSPARENCY



Unlimited Scope Description

Organisations will be able to provide a detailed scope description

Out-of-scope areas

Organisations providing scope exclusions information will not be made public

Legal entity identification

Organisations will need to specify all legal entities included within the scope

New certificate type

An individual CE certificate will be available for each legal entity part of a larger scope



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KEY DATES



13 FEB 2026

Danzell question set v3.3 is published

Now - April 2026

NOW is the time to review your cloud security, MFA, patch management processes to align with the new CE requirements

27 April 2026

All new CE requirements must meet the new requirements

27 October 2026

Six months grace period ends for organisations working under the Willow (v3.2) requirements



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