

TRANSITION AUDIT APPROACH

ISO 21001:2018 → ISO 21001:2025

Educational Organizations Management Systems (EOMS)

Document Reference	SIS-TAA-EoMS-01
Applicable Standard	ISO 21001:2025 (replaces ISO 21001:2018)
Issue No. & Date of Issue	01 & July 2026
Prepared by	Compliance Head, SIS Certifications Pvt. Ltd.
Approved by	Managing Director, SIS Certifications Pvt. Ltd.
Transition Deadline (CB)	September 30, 2026
Transition Deadline (Clients)	July 31, 2028

1. Introduction

ISO 21001:2025 – the revised edition of the Educational Organizations Management Systems (EOMS) standard – was published on 7 July 2025. SIS Certifications Pvt. Ltd. (IAS Accreditation No. MSCB-131), as an IAS-accredited Certification Body, is required to complete its transition to this revised standard by 30 September 2026, in accordance with IAS Technical Bulletin IAS/MSCB/132 dated 21/22 July 2026.

This document sets out the complete Transition Audit Approach adopted by SIS Certifications and is published for the benefit of all stakeholders – certified clients, prospective clients, associate auditors, CB staff, and other interested parties.

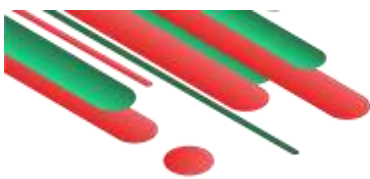
IMPORTANT NOTICE FOR ALL ISO 21001 CERTIFIED CLIENTS

All existing ISO 21001:2018 certificates must be transitioned to ISO 21001:2025 by **31 July 2028**. Certificates not transitioned by this date will be **withdrawn**. Please contact SIS Certifications at the earliest to plan your transition audit.

2. Key Changes: ISO 21001:2018 vs ISO 21001:2025

The following summarises the principal changes introduced in the revised standard, as identified in IAS Technical Bulletin IAS/MSCB/132:

Area of Change		Summary of Revision		
Learner Outcomes & Impact		New KPIs required — beyond completion rates, covering skills acquisition, employability, satisfaction, and long-term societal impact.		
Inclusion, Accessibility & Equity		Embedded as a core requirement across planning and delivery; demonstrated accessibility for learners with disabilities, remote learners, and varied socioeconomic backgrounds.		
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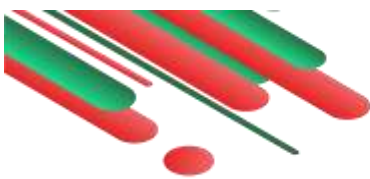
Area of Change	Summary of Revision
Digital Integration & AI-Readiness	Mandatory integration of digital tools into strategic planning, monitoring of online engagement, prevention of digital exclusion, and ethical use of AI in teaching and assessment.
Sustainability & Social Responsibility	Earlier environmental notes expanded into a holistic sustainability framework aligned with UN SDG 4 (Quality Education); organizations must show contribution to societal well-being.
Structure & Governance	Clause structure updated to align with the 2025 ISO revisions; governance now emphasizes strategic alignment, leadership accountability, risk-based thinking, and measurable outcomes.
Stakeholder Engagement	Expanded guidance for engaging all learners and interested parties, with strengthened communication and feedback loops.
Documentation Requirements	Reframed as "information management," allowing greater flexibility in how organizations maintain evidence of compliance.
Innovation & Continuous Improvement	Continuous improvement extended beyond PDCA to require ongoing monitoring, evaluation, and innovation as core management system components.
Digital Readiness & Cybersecurity	Clearer expectations for online learning quality, cybersecurity, and management of virtual classrooms and blended learning environments.
Learner-Centered Culture	Strengthened requirement to place learners at the centre of all processes — personalised support, feedback-driven improvement, and tracking of learner progress and satisfaction.

Note: Refer to the *SIS Certifications Gap Analysis – ISO 21001:2018 & ISO 21001:2025* document for the detailed clause-by-clause mapping.

3. Transition Timeline

The following timeline governs the transition process for both SIS Certifications (as the CB) and its certified clients, per IAS/MSCB/132:

Date / Milestone	Activity / Obligation	Responsibility
July 7, 2025	Publication of ISO 21001:2025	ISO
July 21/22, 2026	IAS Technical Bulletin IAS/MSCB/132 issued	IAS
By August 15, 2026	SIS Certifications submits documented gap analysis, transition arrangements, evidence of implementation, personnel authorisation and competence records, and its transition audit programme to IAS	SIS Certifications
Ongoing (post-bulletin)	New initial and recertification audits conducted by SIS Certifications must move to ISO 21001:2025 as per its own accreditation transition date	SIS Certifications



Date / Milestone	Activity / Obligation	Responsibility
September 30, 2026	IAS deadline: all accredited CBs must complete transition. CBs not transitioned lose EOMS accreditation.	IAS / SIS Certifications
Post-transition	IAS office assessment (verifying revised processes, personnel competence, and progress of client transition) and witness assessments against ISO 21001:2025	IAS
By July 31, 2028	All certified clients must complete transition to ISO 21001:2025. Old certificates are withdrawn.	Certified Clients / SIS

4. SIS Certifications – CB Transition Actions

4.1 Gap Analysis & Procedure Updates

SIS Certifications has undertaken / shall undertake the following actions to demonstrate readiness for ISO 21001:2025 certification activities, for submission to IAS by 15 August 2026:

- Documented gap analysis mapping changes between ISO 21001:2018 and ISO 21001:2025
- Revision of the EOMS Certification Procedure to incorporate the revised clause structure, learner-outcome KPIs, and inclusion/accessibility requirements
- Update of application review forms and audit checklists to reflect the new digital readiness, AI-ethics, and sustainability requirements
- Update of certification decision criteria and technical review procedures

4.2 Personnel Competence & Training

All personnel involved in ISO 21001:2025 certification activities – including auditors, application reviewers, and decision makers – shall demonstrate competence against the revised standard prior to being authorised:

- Awareness training on ISO 21001:2025 changes conducted for all EOMS auditors
- Competence evaluation records updated (training records, evaluation scores, certificates)
- Authorisation of audit team members evidenced and maintained in auditor competency files
- Internal training evaluation forms circulated to all EOMS-scheme personnel, with records forwarded to IAS as part of the transition submission

4.3 Audit Programme Transition Plan

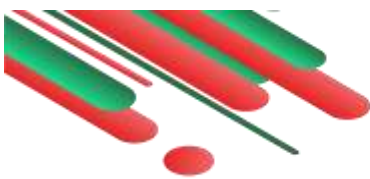
SIS Certifications has established a transition audit programme covering all currently certified EOMS clients. The programme includes:

- Identification of all clients holding ISO 21001 certificates, with expiry dates
- Scheduling of transition audits within existing certification cycles wherever possible
- Communication to each client via formal email outlining the transition requirements, timeline, and consequences of non-transition
- Recording of transition status for each client in the certification management system

5. Transition Audit Approach – For Certified Clients

5.1 Transition Audit Duration (Mandays)

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In accordance with IAS Technical Bulletin IAS/MSCB/132, the following minimum audit durations apply for transition audits:

Transition Audit Scenario	Minimum Auditor Days
Transition audit conducted together with a Recertification Audit	Minimum 0.5 auditor day
Transition audit conducted together with a Surveillance Audit	Minimum 1.0 auditor day
Transition audit conducted as a standalone / separate audit	Minimum 1.0 auditor day

Note: The transition audit shall not rely solely on document review. Verification of implementation through **on-site or remote assessment** is required.

5.2 Transition Audit Scope & Focus Areas

The transition audit shall specifically review the following areas arising from changes introduced in ISO 21001:2025:

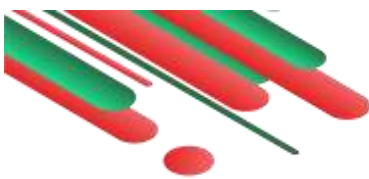
- **Learner outcomes & impact KPIs:** evidence of measurement of skills acquisition, employability, satisfaction, and long-term societal impact — not just completion rates
- **Inclusion, accessibility & equity:** demonstrated accessibility for learners with disabilities, remote learners, and diverse socioeconomic backgrounds, embedded across planning and delivery
- **Digital integration & AI-readiness:** integration of digital tools into strategic planning, monitoring of online engagement, prevention of digital exclusion, and ethical use of AI in teaching and assessment
- **Sustainability & social responsibility:** alignment with UN SDG 4 and evidence of contribution to societal well-being
- **Revised clause structure & governance:** strategic alignment, leadership accountability, risk-based thinking, and measurable outcomes
- **Stakeholder engagement:** strengthened communication and feedback loops with learners and interested parties
- **Documentation as information management:** evidence maintained in the organization's chosen format, demonstrating equivalent control
- **Digital readiness & cybersecurity:** controls over online learning quality, virtual classrooms, and blended learning environments
- **Learner-centred processes:** personalised support, feedback-driven improvement, and tracking of learner progress and satisfaction
- Internal audit and management review records against the revised standard

5.3 Transition Audit Method

- **Interview of key roles:** Top Management, Academic/Programme Heads, IT/Digital Learning Lead, Quality/Compliance, Learner Support staff
- **Document review:** updated policies, procedures, KPI records, risk register, accessibility and inclusion plans
- Process observation and/or verification of digital learning platforms, AI-assisted tools, and learner support mechanisms (on-site or remote per IAF MD 4 criteria)
- Review of corrective actions for any previously identified nonconformities
- Sampling of records: learner outcome data, feedback logs, accessibility accommodations, training and competence records

5.4 Possible Audit Outcomes

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Finding Type	Description	Client Action Required
No Finding	Full conformance with ISO 21001:2025 demonstrated	Certificate upgraded to :2025
Observation	Minor improvement opportunity noted; no nonconformity	Address at next scheduled audit
Minor Nonconformity	Single/isolated gap not indicating system failure	Root cause and correction within 90 days
Major Nonconformity	Systematic or critical gap; EOMS effectiveness compromised	Immediate corrective action; certificate on hold until resolved
Transition Not Completed by Deadline	Client fails to complete transition by July 31, 2028	ISO 21001 certificate withdrawn by SIS Certifications

6. Consequences of Non-Transition

IMPORTANT: Consequences of Failing to Transition

If a certified client **does not** complete the transition audit to ISO 21001:2025 before **31 July 2028**:

- SIS Certifications will be required to **WITHDRAW** the client's ISO 21001 certificate.
- The client will no longer be able to claim ISO 21001 certification.
- Re-certification under ISO 21001:2025 will require a **fresh initial audit** cycle.
- SIS Certifications itself will lose IAS accreditation for EOMS activities if it does not complete its own transition by 30 September 2026.

7. Action Required from Certified Clients

Clients currently holding ISO 21001 (EOMS) certification issued by SIS Certifications are requested to take the following steps without delay:

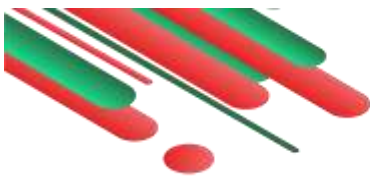
1. Review the changes introduced by ISO 21001:2025 (detailed in Section 2 of this document & the Gap Analysis document) and assess your organization's current EOMS against the revised requirements.
2. Conduct an internal gap analysis and update your EOMS documentation, learner-outcome KPIs, and accessibility/digital-readiness controls accordingly.
3. Contact SIS Certifications Compliance Head at compliance@siscertifications.com to schedule your transition audit at the earliest opportunity.
4. Ensure that internal audits and management reviews against ISO 21001:2025 are completed prior to the transition audit.
5. Plan your transition well in advance to avoid last-minute scheduling constraints and risk of certificate withdrawal.

8. Information for Associate Auditors

All associate auditors empanelled with SIS Certifications for the EOMS (ISO 21001) scheme must comply with the following prior to conducting ISO 21001:2025 transition or certification audits:

- Complete the SIS Certifications ISO 21001:2025 awareness training and pass the internal competence evaluation (minimum score 70%)

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- Obtain authorisation from the Compliance Head / Director-Operations for conducting audits under the revised standard
- Demonstrate familiarity with learner-outcome KPIs, inclusion/accessibility requirements, digital & AI-readiness provisions, and sustainability expectations
- Maintain updated CPD records reflecting ISO 21001:2025-specific training
- **Note:** Auditors authorised only for ISO 21001:2018 cannot independently conduct 2025 transition audits until re-authorised

9. Contact Information

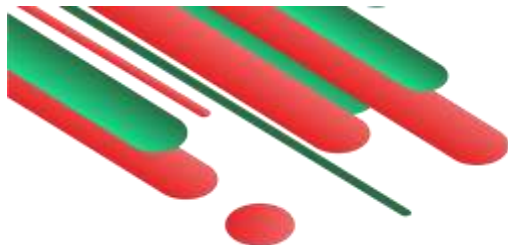
Organisation	SIS Certifications Pvt. Ltd.
Accreditation No.	MSCB-131 (IAS Accredited)

Document Control

This document is issued for public information purposes on the SIS Certifications website. It shall be reviewed and updated whenever material changes occur to the transition requirements or IAS/other AB instructions.

For the latest version, visit: www.siscertifications.com footer.

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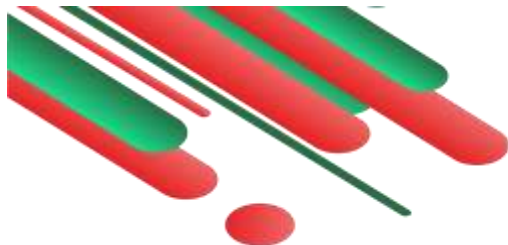
GAP ANALYSIS: ISO 21001:2018 vs ISO 21001:2025 with Impact Level

Educational Organizations Management Systems (EOMS)

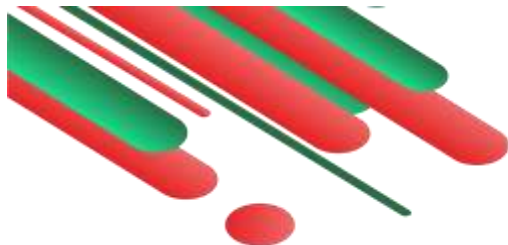
Impact: HIGH	Impact: MEDIUM	Impact: LOW
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#	Clause / Section	ISO 21001:2018 Requirement	ISO 21001:2025 Requirement	Change Type	Impact Level
S-01	Overall Standard Edition	First edition (2018-05). Standalone EOMS standard aligned with ISO 9001, HLS structure.	Second edition (2025-07), technically revised. Foreword states the main change: "assessment related text has been revised to reflect current best practices in educational assessment."	RESTRUCTURED	MEDIUM
S-02	Scope	Applies to organizations using a curriculum to support development of competence through teaching, learning or research, regardless of type, size or method of delivery.	Scope extended to "teaching, learning, training or research." New statement added: "This document also provides guidance for the use of a EOMS."	MODIFIED	LOW
S-03	Terms & Definitions	44 defined terms (3.1-3.44). No standalone definitions for formative/summative assessment or "learner with special needs"; "usability" is a separate term underlying accessibility.	47 defined terms (3.1-3.47). Four NEW terms added: assessment (3.44), formative assessment (3.45), summative assessment (3.46), learner with special needs (3.47, now a formal defined term with example/note). "Usability" folded into the accessibility definition.	EXPANDED	HIGH

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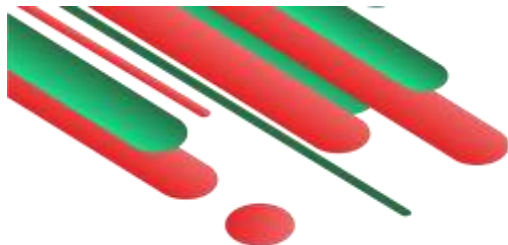
#	Clause / Section	ISO 21001:2018 Requirement	ISO 21001:2025 Requirement	Change Type	Impact Level
S-04	Introduction – Benefits of EOMS	Lists benefits a) through j) (alignment, social responsibility, personalization, credibility, culture of improvement, etc.).	Adds NEW benefit k): "continual improvement of the design and development of study programs to ensure the development of the competencies of learners to meet the needs of all interested parties."	EXPANDED	LOW
C-01	Clause 4.1 – Context of the Organization	Organization determines external/internal issues relevant to purpose, social responsibility and strategic direction. No explicit reference to climate change.	NEW explicit requirement: "The organization shall determine whether climate change is a relevant issue." Reference to "social responsibility" removed from the issues list.	NEW	MEDIUM
C-02	Clause 4.2 – Interested Parties	Organization determines relevant interested parties and their relevant requirements (learners, other beneficiaries, staff).	Adds a third determination: "which of these requirements will be addressed through the EOMS." New note that relevant interested parties can have requirements related to climate change.	MODIFIED	MEDIUM
C-03	Clause 5.1.1 – Leadership & Commitment	14 leadership commitments (items a-n), e.g. accountability, policy alignment, resource provision, strategic plan, social responsibility.	17 commitments (items a-p). NEW items: ensuring educators/staff maintain, update and improve their competence; and promoting fairness, transparency and ethical behaviour at all levels of the organization.	EXPANDED	MEDIUM
C-04	Clause 5.2 – Educational Organization Policy	Titled "Policy," split into sub-clauses 5.2.1 Developing the policy and 5.2.2 Communicating the policy.	Retitled "Educational organization policy"; sub-clause structure removed and consolidated into a single clause with the same substantive content.	RESTRUCTURED	LOW



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#	Clause / Section	ISO 21001:2018 Requirement	ISO 21001:2025 Requirement	Change Type	Impact Level
C-05	Clause 5.3 – Roles, Responsibilities & Authorities	Top management assigns responsibility/authority for EOMS conformity, reporting performance and improvement opportunities is combined under one item.	Reporting duties split into two distinct explicit items: (b) reporting on EOMS performance to top management, and (c) reporting on opportunities for improvement to top management.	MODIFIED	LOW
C-06	Clause 6.2 – Educational Organization Objectives	Objectives must relate to conformity of products/services and enhancement of learner, staff and other beneficiary satisfaction.	Beneficiary list expanded to explicitly include "educator, academic administration and staff." New explicit requirement that objectives "be available as documented information."	MODIFIED	LOW
C-07	Clause 7.2.1 – Competence (General)	Includes a separate requirement to "take actions to support and ensure the continual development of relevant staff competence."	Streamlined into fewer, condensed requirements; explicit "continual development" bullet removed as a stand-alone item, folded into general competence-acquisition requirement.	MODIFIED	LOW
C-08	Clause 8.1.1 – Operational Planning & Control	Control of externally provided processes addressed primarily via cross-reference to 8.4.	NEW explicit statement added: "The organization shall ensure that externally provided processes, products or services that are relevant to the EOMS are controlled," in addition to the 8.4 cross-reference.	NEW	MEDIUM
C-09	Clause 8.1.2 – Specific Operational Planning (Products & Services)	Planning items include "defining criteria for learning assessment" and "conducting learning assessment."	Items split and relabelled: "conducting learning" (c), "defining criteria for assessment" (d), "conducting assessment" (e) — reflects the standard's broader assessment-terminology overhaul.	MODIFIED	MEDIUM

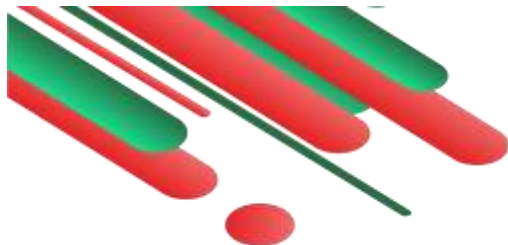
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C-10	Clause 8.5.1.4 – Summative Assessment	Requires methods to detect plagiarism/malpractices, communicated to learners.	Requires "adequate assessment security measures to prevent AND detect plagiarism and other malpractices," communicated to learners, PROCTORS and other interested parties — broadened scope and stakeholder coverage.	MODIFIED	HIGH
C-11	Clause 8.5.1.5 – Recognition of Assessed Learning	Uses "outcomes of the assessment activity and grade" terminology; learners informed of outcomes and grade, given right to appeal.	Terminology standardised to "assessment score and grade" throughout — the headline change identified in the Foreword ("assessment related text has been revised to reflect current best practices in educational assessment").	MODIFIED	HIGH
C-12	Clause 9.2 – Internal Audit	Single clause covering both general intent and audit-programme requirements together.	Split into 9.2.1 General and 9.2.2 Internal Audit Programme. New explicit requirement to "define the audit objectives, criteria and scope" for each audit (objectives now explicit).	RESTRUCTURED	MEDIUM
C-13	Clause 9.3.2 – Management Review Inputs	Inputs presented as a single consolidated list (status of prior actions, context changes, performance trends, resources, risks, improvement, staff feedback).	"Changes in needs and expectations of interested parties" broken out as its own distinct input. Trend list now references "formative and summative assessment scores" (replacing "assessment outcomes").	MODIFIED	MEDIUM
C-14	Clause 10 – Improvement (Sequence)	Sub-clause order: 10.1 Nonconformity and corrective action; 10.2 Continual improvement; 10.3 Opportunities for improvement.	Sub-clause order changed: 10.1 Continual improvement; 10.2 Nonconformity and corrective action; 10.3 Opportunities for improvement —	RESTRUCTURED	LOW

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#	Clause / Section	ISO 21001:2018 Requirement	ISO 21001:2025 Requirement	Change Type	Impact Level
			continual improvement now leads the clause.		
A-01	Annex A – Early Childhood Education (Facilities)	Where an organization offers ISCED 1+ education alongside ECE, it "should" provide a separate space, dedicated educator and resources for ECE (recommendation).	Upgraded from a recommendation to a mandatory requirement: the organization "shall" provide a separate space, dedicated educator, teaching and learning resources for ECE.	MODIFIED	MEDIUM
A-02	Annex F – Mapping to Regional Standards (EQAVET)	Two simple two-column requirement-matrices mapping ISO 21001 clauses to EQAVET criteria (Table F.1 and F.2).	Replaced with a comprehensive thematic-cluster mapping (10 clusters, e.g. Leadership & Strategy, Data Protection & Control, Design & Delivery of Services, Analysis & Evaluation) based on the VET21001 Toolkit, with full EQAVET indicative-descriptor text reproduced.	RESTRUCTURED	MEDIUM
A-03	Bibliography – Assessment & Reference Updates	No dedicated assessment-outcomes standard referenced; ISO/IEC 27001 cited under its prior (2013-era) title; no VET21001 Toolkit reference.	NEW reference added: ISO 29992, "Assessment of outcomes of learning services — Guidance." ISO/IEC 27001 citation updated to "Information security, cybersecurity and privacy protection." VET21001 Toolkit added as an informative source.	NEW	MEDIUM

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