Briefing: DfE Data Spine and MIS project must fix data governance in School Information Management Systems ahead of 2027 rollout plans

November 23, 2026

DfE must prioritise pupil rights in the current work underway that affects pupil data in the Data Spine, the single unique identifier rollout, and the EdTech interoperability requirements in its MIS framework, run as "one conversation"[1] in England. The 2020 ICO audit of the DfE identified a wide range of failures including Articles 12,13 and 14 that remain unresolved. Mechanisms must first be built into every school MIS to manage those rights today, and certainly before more data is accessed, extracted or transferred between systems in future.

TES has reported that Sir Jon Coles, chief executive of United Learning, said that the information-sharing initiative is the "*most concerning thing to come from government on education,*" that he can remember (Tes, 2026). He said: *"I don't think this is just a big education story, I think it's a huge political story. Data protection is a massive concern for people. I don't want the government having all this information about my children. It's an extraordinary overreach"* (Tes, 2026).

Schools Week reported similarly the CEO of England's largest MAT called the government's Data Spine plan, "*a vast expansion of the surveillance state without any rationale and would give not only this government, but every future government of whatever political party, potentially unlimited access to an unlimited amount of personal information about every child and every adult in state schools.*" (Dyson, 2026).

This is expected to ultimately become the route to automate the school censuses and one of the data sources feeding Alan Milburn's emerging standards for public data from schools and employment, (further connected to the LEO dataset) Skills England and Local Authorities, and DWP interoperability.

What we ask of DfE

1. Commit to putting permitted purposes in legislation, with a statutory firewall from accountability, inspection and enforcement, as DfE gave for attendance targets in 2025.
2. Separate the MIS framework mandate from the Spine in writing, including in the suppliers' framework terms, and remove the Spine from the tender notice's remit.
3. Publish the Spine DPIA, including a full field list and the purposes and lawful basis for every data flow; a necessary step before any trust must align their procurement under paragraph 2.30 of the Academy Trust Handbook (updated 1 Oct 2026).
4. Publish the Spine proof-of-concept findings, the Wigan SUI pilot findings, and the full 2020 ICO audit report. Set out how the fairness obligations and GDPR failures are met in each new plan.

[1] https://www.youtube.com/watch?v=1JWLipIIBeA

5. Publicly explain in parallel the SUI plans to reuse the NHS number for every child in education and set out its architecture for consultation. See our separate briefing on building a separated linkage key instead of copying it.
6. Pause the Data Spine, the identifier rollout in MIS, and the MIS procurement changes scheduled for procurement in Spring 2027 and to come into effect in autumn, to first ensure the data governance and oversight model is built to manage existing rights' management and include signals work in every MIS before expanding the data scope it affects.
7. As with the immigration fields, someone will tell parents. DfE should consult teachers, parents and pupils, and proactively explain how and who will tell families of their rights and how to exercise them, including assurance for any rights' architecture, before more data flows. Or it happens at the last minute, and trust is further eroded.

What we ask of the ICO

The ICO should act with urgency.

1. Require DfE to produce the Spine DPIA and seek prior consultation with the ICO under the DUAA Article 36, before any Spine processing starts or MIS PIN procurement proceeds.
2. Publish its view on public sector procurement mandates that precede any DPIA and reiterate Article 36 obligations.
3. Publish the current understanding of DfE's closure of the 139 audit recommendations and action to comply with any enforcement obligations and actions, along with the full 2020 audit with particular attention to the failures identified on rights around Articles 12-14.
4. The development of the ICO Code of Practice for children's data in education that the government committed to in 2025 and is now in development, must cover all of the data environment and include all of these systems in its scope. Alongside the code, the ICO should explain how the edTech interoperability obligations in the new certification scheme will ensure purpose limitation of data access or transfer from edTech into the Spine and to the DfE or any other third party.

Governance before architecture

DfE is building the technical architecture first through procurement, before it has published any of the governance that should shape it. Once supplier contracts lock an API route into every school, the design choices that protect children become far harder to make.

There does not appear to have been Article 36 prior consultation with the ICO, and there appears to be no DPIA that would have enabled the DfE to assess the respective responsibilities of the controller, joint controllers and processors involved in the processing - in particular, for processing within a group of undertakings; being explicit on the purposes and means of the intended processing; and the measures and safeguards provided to protect the rights and freedoms of data subjects - all of which would be necessary to assess the need for prior consultation.

The DfE MIS procurement engagement definitions on data seem rather unique and out of step with UK data protection law, including that school data is defined as "property of the buyer" [the schools] and that telemetry data would be out of scope in its definition of personal data.

Academy trusts have been told they must align MIS contracts with the framework by September 2027 (Department for Education, 2026a). The framework requires systems to be API-enabled for sharing with DfE (Department for Education, 2026b). And yet DfE has published no DPIA, no lawful basis or field list for what the Spine will carry, and families have no way to object.

DfE has not publicly stated what problem the Spine is meant to solve or how, or what it would look like. Nor has it said whether children in it would be identified by the UPN, the NHS number, both or neither.

To ensure trustworthiness in the eyes of schools, suppliers and the public, we recommend:

1. Assessment of lawful basis, which is then published - including what must be set out in regulations laid before Parliament.
2. Permitted purposes and a published field list, with a written firewall from accountability and enforcement.
3. A governance architecture: who may request data, who approves each query, and what say schools have as [joint] data controllers and how they exercise it - including the measures and safeguards provided to protect the rights and freedoms of data subjects.
4. Independent oversight, with published DPIAs, audit, and a working route for pupils and families to object and seek redress, while their children are in school and after they leave.
5. The technical architecture, specified to meet steps 1 to 4, and only then procurement.

The MIS framework today appears to have started at step 5. Core Principle 17 and Handbook paragraph 2.30 (Department for Education, 2026a, 2026b) have been issued, and DfE has published nothing for steps 1 to 4.

Procurement should require rights flags and school-level approval controls in every MIS, with every query logged and auditable end-to-end. Lawful processing requires that this must be done today, but for example even the DfE cannot tell pupils and parents where their data has gone today from the National Pupil Database.

Today, in the NHS, audits are at multiple levels including a centralised patient audit record service to meet legal obligation to maintain an audit trail of the interactions. NHS PARS provides an audit capability that services can use instead of developing their own audit store and reporting solution.[2]

Like the 2014 Partridge Review of health data, an independent audit should be done on the commercial reuse of children's personal confidential data from national pupil data, distributed at national level, to find out where it has gone and inform families and the data subjects in the MIS and databases as-is today.

What governed data-sharing architecture looks like: lessons to learn from health

DfE proposes using the NHS number as a unique identifier in education. That number exists as part of an ecosystem, linking together lifetimes within decades-long, evolving systems of governance and oversight and well-defined, published processes and procedures, from which significant lessons can be learned.

[2] https://digital.nhs.uk/services/patient-audit-record-service

One gateway for every supplier. In 2010 EMIS and INPS, whose GP systems then covered about 75% of UK practices, set up a 50:50 joint venture, Healthcare Gateway, to run the Medical Interoperability Gateway (MIG) (Digital Health, 2010). Other GP systems, including TPP's SystmOne and Microtest, later signed up to it (Digital Health, 2013). It spread through local commissioning, as areas chose to buy it to share records between their own services. No national mandate was needed. A hospital or community service connects once to the gateway and can then reach records held in any connected GP system. The schools equivalent would be MIS suppliers building to one public gateway standard, with rights controls inside it. That would replace hundreds of separate supplier-to-DfE connections, each needing its own audit.

The MIG also shows why ownership and access terms matter. For a time TPP and Healthcare Gateway failed to agree terms, and a London pilot was dropped. A gateway for children's records would need public governance of its ownership and terms of access.

In the 2026 webinar DfE MIS Framework Deep Dive Session 7 Data Principles Education Data[3], for MIS providers, one provider raised the substantial question of the cost and impracticality without an integrator at scale (15:15). And another said that free API at no cost is impractical (15:50) and open to abuse. There is no information available if the DfE has done an assessment of this.

Independent approval of each data flow. Trust requires governance and accountability, not just technology. Section 251 of the NHS Act 2006 and the Control of Patient Information Regulations 2002 allow the duty of confidence to be set aside for a specific purpose where consent is impracticable (Health Service (Control of Patient Information) Regulations 2002; National Health Service Act 2006, s. 251). The Confidentiality Advisory Group (CAG) gives independent advice on each application and can attach conditions. Approvals are published and reviewed every year. Confidentiality stays the default, and each exception is argued and recorded.

What care.data showed. Under care.data, GP data was to be extracted through the General Practice Extraction Service (GPES). Each extraction needed a specification approved by the GPES Independent Advisory Group. Patients could register a type 1 objection on their GP record, and GP systems had been built to hold back that patient's data at extraction (Health and Social Care Information Centre, 2015; Independent Information Governance Oversight Panel, 2014). Even so, care.data closed in 2016. Carter, Laurie and Dixon-Woods (2015) found it had legal authority and still lost its social licence. Its successor was paused in 2021 after more than 1.2 million people opted out in June alone. Technical controls on their own did not secure public consent.

What this means for the Spine:

- One gateway built to a published standard, under public oversight, that every MIS connects to.
- A per-pupil objection flag held in the MIS and honoured at the gateway, as type 1 objections were in GP systems.
- An independent advisory group, on the CAG model, approving each data flow against a published specification, with annual review. Its minutes and decisions should be published, as the CAG and its predecessors, the Patient Information Advisory Group and the NIGB Ethics and Confidentiality Committee, have done.

[3] https://www.youtube.com/watch?v=Lt9Qudh4kK4

- Regulations that keep the duty of confidence as the default, with exceptions granted purpose by purpose. That means restoring what s.251A of the Health and Social Care Act 2012 gave children's identifiers (Health and Social Care Act 2012, s. 251A).
- If the NHS number is used as the child identifier, this will require a Caldicott Guardian role in each school, trust and local authority, and a remit for the National Data Guardian.
- Data usage reports that let each family see which bodies received their child's data and why, backed by an audit trail held at the gateway.
- A statutory linkage body, independent of DfE and DHSC, holding the linkage keys.

Direct care and secondary uses need different rules

The Spine treats every data flow alike. Two kinds of sharing should be kept apart, as they are in health.

Multi-agency work such as inter-agency referral discussions, or Scotland's Getting It Right For Every Child approach, needs professionals to share information about a named child to keep them safe. This is closest to *direct care* in health. It should run case by case, with each disclosure flagged and recorded on the child's record.

Other uses such as planning, statistics, research and service evaluation are classed as *secondary re-uses*. Families should be able to exercise their existing data rights in law at the point of contact, where the relationship is managed between the family and their school.

When these two uses are mixed, operational and enforcement uses piggyback on research justifications today in the National Pupil Database and reuse of school census data. All lawful bases must be clarified. Research access should run through trusted research environments under the Five Safes, as the ONS Secure Research Service does - and as UK Biobank says it does, though its practices show otherwise - so data stays in one place and researchers query it there with access, not through distribution or copying and transfer to new databases.

Where things stand

The API route into every school is being locked into contract terms and conditions[4] while DfE says no decisions on the Spine itself have been made, although they appear far in development. (DfE, 2026h). Lack of clear public communications, obfuscation and apparently conflicting/contradictory statements are corrosive of trust.

Date (2026)	What happened
13 November	MIS supplier engagement closed (Tes, 2026). There has been no *public* engagement.
5 November	DfE seeks two MIS platforms to test writing NHS numbers into school systems (Schools Week, 2026).

[4] https://youtu.be/g4HyVycHT1k

Date (2026)	What happened
29 October	Schools minister confirms DfE considered building its own MIS; framework working group was eight academies and five maintained-school representatives (Dyson, 2026).
28 October	DfE tells Tes no final decisions made on the Spine; says a DPIA exists but does not provide it (Tes, 2026).
19 October	DfE says the framework is independent of the Spine and "all schools are expected to use it" (Department for Education, 2026e).
1 October	Academy Trust Handbook para 2.30: MIS contracts aligned with the framework by September 2027 (Department for Education, 2026a).
27 August	DfE describes a federated model: "It can be anyone on the Data Spine" (Department for Education, 2026e).
17 and 24 August	No dialogue on contract terms; no draft documents before the tender (Department for Education, 2026e).
3 August	Framework set at £800m over six years from June 2027; Spine "paused"; Spine still within the notice's remit (Department for Education, 2026d).
17 July	Core Principle 17: systems API-enabled to share with other schools, EdTech providers and DfE (Department for Education, 2026b).
1 July	Ministerial statement commits to a national MIS framework for every school; no mention of the Spine (Phillipson, 2026).
9 April	MIS and Spine engagement run as "one conversation"; test areas attainment, SEND and behaviour (Department for Education, 2026e)
26 March	Market notice places Spine outcomes within the MIS route to market (Department for Education, 2026g).
February	Schools White Paper names the Data Spine: "data such as pupil records, attendance, progress and assessments" (Department for Education, 2026c).
12 January	DfE pilot for a "continuous and consistent" API data exchange with MIS suppliers (Department for Education, 2026f).

Why the sequence of timing is wrong

Once every school system is contractually API-enabled for DfE, what flows through it becomes an administrative choice. It would need no further procurement, consultation or legislation. In engineering terms, it is unwise to install pipes without properly designed taps, valves and inspection regimes.

The single unique identifier needed primary legislation, and ministers say they will mandate it only when confident in its "benefits, costs, security and governance" (Schools Week, 2026). But the Spine processes have no clear statutory basis or safeguards for the new flows it enables. And if it uses the NHS-number identifier, school records become linkable across health, social care and police systems (Defend Digital Me, 2026b).

The Children's Wellbeing and Schools Act 2026 s.16LA places a duty to share on safeguarding partners and while the law as drafted states *explicitly* that disclosure does not breach confidence (Children's Wellbeing and Schools Act 2026) this is contrary to the HSC Act 2012. In effect, the 2012 safeguards on the NHS number, a right to object and the duty of confidence under s.251A, no longer hold up for children.

Under the revised data protection law, the Data (Use and Access) Act 2025, vague safeguarding reuses no longer require a balancing test when relying on legitimate interests (Data (Use and Access) Act 2025). This is an ongoing erosion of safe data use by third parties who cannot rely on a public task basis.

Daily attendance data shows this continual scope creep. DfE called it voluntary in 2023 and mandatory in 2024 (Department for Education, 2023, 2024). By November 2025, every school had an AI-generated attendance target. That collection began before its DPIA was signed off, and DfE declined the ICO's request to pause whilst telling schools it had ICO approval.

On 28 October 2026, Tes reported that DfE has not decided which data the Spine would take or who could use it. But the mandate on school academy trusts is already in force to permit it.

BESA, which represents suppliers, has asked DfE to publish its DPIA, because suppliers hold large volumes of data on behalf of schools, pupils and parents (Tes, 2026). These data go well beyond what the DfE currently extracts in the termly school census and further data collections from AP, for certain age groups, or statutory testing, e.g. Baseline.

School leaders' unions are asking the same questions. NAHT says its members are "extremely anxious" about how other parties might use the data. DfE has not said whether or not the Spine would be used to feed school accountability measures (Tes, 2026).

Does current law allow this without new regulations?

Every past expansion of what schools must send DfE about individual pupils was made by regulations laid before Parliament. The Spine is being set up through a funding-agreement handbook and procurement terms. DfE should undergo a legal basis review *before* any trust must comply.

The power sits in section 537A of the Education Act 1996. It lets the Secretary of State require schools, academies included, to provide prescribed information about individual pupils. The Education (Information About Individual Pupils) (England) Regulations 2013 say what is prescribed. The 2009 Prescribed Persons Regulations, as amended in 2013, say who DfE may pass it on to.

The Education Act 1996 as originally passed prohibited the collection of pupils' names. Section 537(5) said: "No information provided [by schools] in accordance with regulations under this section shall name any pupil to whom it relates." But this was amended in 1998 to read at 537A(7): "No information

received under or by virtue of this section shall be published in any form which includes the name of the pupil or pupils to whom it relates."

And despite a direction of travel that had led to a relentless erosion of rights in law, there has been no concerted effort to communicate these changes to pupils past or present since these data distributions from schools to DfE began.

Regulations	What they changed
SI 2024/209	Made daily attendance mandatory; schools must keep it in their MIS so it can be extracted whenever required
SI 2022/599	Added census fields, including education outside the school
SI 2016/808	Added nationality, country of birth and English proficiency
SI 2013/2094	Set out the information every school must provide on request
SI 2013/1193	Let DfE release identifying pupil data to third parties for "education or well-being"

The Spine follows a different route. Paragraph 2.30 of the Academy Trust Handbook binds trusts through their funding agreements. Core Principle 17 binds suppliers through contract. Parliament has seen neither.

Sir Jon Coles, who worked at DfE for 15 years, told Tes the department is "vastly exceeding" what the Handbook can be used for and risks serious legal challenge (Tes, 2026). An October update to the Handbook expects trusts to award contracts under the framework "as soon as practicable after its launch" (Department for Education, 2026a), before anyone has seen its terms. DfE's first Spine test areas reach past the prescribed lists, into behaviour records beyond exclusions and "any other factors that influence well-being" (Department for Education, 2026e).

Questions of lawfulness for DfE and the ICO:

- Does section 537A, with the 2013 Regulations as they stand, permit a standing API extraction of data outside the prescribed lists? If it does not, which regulations will DfE lay before Parliament, and when?
- Can a funding-agreement condition or a supplier contract term be the "basis in law" that Article 6(3) UK GDPR requires for public task processing? Does it meet the Article 8 ECHR test of being in accordance with the law, and clear and foreseeable to the families affected?
- Maintained schools are outside the Handbook. What power would require them to connect?
- Which legal gateway would govern onward sharing from the Spine, and who could receive data through it?
- Has DfE taken legal advice on these points and, if so, will it publish it? DfE has told Tes it will test the Spine's design against legal requirements, necessity and proportionality (Tes, 2026). That assessment should be made public before any trust has to sign.

The rights gaps in school systems today

The ICO's 2020 audit found DfE in breach of Articles 12, 13 and 14 UK GDPR on informing people. DfE closed all 139 recommendations on its own assessment in 2025 (Department for Education, 2025). For pupils and families, nothing has changed in practice.

- No parent or child can opt out of the school census (HL2698, 2024).
- No right to object or balancing test operates on reuse of identifying National Pupil Database (NPD) data by third parties.
- Notice stops when a pupil leaves school. Records collected from age 2 are kept indefinitely.
- DfE's subject access process is little known and unsuited to children, and not 'advertised'.
- Schools, as data controllers, are not told what is optional or under which law it is collected.
- No one can find out whether their own or their child's personal data is in any of at least 2,385 third-party bulk DfE data distributions to third parties since 2012 (Defend Digital Me, 2026a).

Policy is far ahead of what the public has been told, wants or expects. In DDM's 2018 Survation poll, 69% of parents said they had never been told how pupil data is shared.

DfE's own public engagement research with DSIT in 2024 found parents and pupils want identifiers kept at school level, unshared with government or tech companies (Thinks Insight & Strategy, 2024).

The 2013 ADRN UK-wide public engagement on *deidentified* personal data included red lines on creating mega databases and commercial re-use.

The fix: signals to exercise rights built into the MIS

The MIS suppliers suggest that the commercialisation of "school data" (that is built from pupil data) such as re-use of pupil data to build comparative data is already widespread across MIS commercial practice.[5]

The intention and direction of travel is to further "open out that data" and "with Skills England, DWP and addressing the problem around NEETS".[6]

The MIS framework is the right place to build rights management, because every school system is being re-specified anyway. Suppliers already add census fields every year. This must happen before the PIN.

1. At admission, the school asks the family once: do they object to re-use beyond school under public task, and do they opt out of secondary re-uses under legitimate interests?
2. The answer is coded into the pupil's MIS record.
3. Integrators (Wonde, Groupcall and others) and any EdTech using direct connections must host and maintain this in a receiving field for that flag.
4. DfE carries the same field at its point of entry, including into the NPD.
5. Every onward share first checks the flag, so each release is auditable against the family's choice.
6. Changes and refreshers go through the school, which holds the relationship with families.

[5] https://www.youtube.com/watch?v=Lt9Qudh4kK4 46:45 "We use our schools' data, anonymised, to do interesting things". Seen by DfE as "a valid use case" and "of huge benefit".
[6] https://www.youtube.com/watch?v=Lt9Qudh4kK4 54:07 "multiple joins across multiple datasets, you need a complete data warehouse".

DfE must also decide whether the NPD is a research database or an operational one, and deconflate the two. Research use carries exemptions that operational reuse for enforcement removes. An operational database must support every data subject right and clearly define each controller of each reuse.

People now aged 18 to 25 must get retrospective notice and an opt-in for indirect reuse of their childhood records, or reuse that has not gone through fair processing or rights' notification must be ended.

Cost, waste and competition

Core Principle 17 requires every MIS to be API-enabled for sharing with DfE. DfE has not said who pays to build and run those connections. If the cost sits with suppliers, schools will meet it through licence fees, inside a framework worth £800 million over six years (Department for Education, 2026d). A separate £360 million software reseller contract has also been mentioned by DfE (Dyson, 2026).

Smaller suppliers may not manage a build to a specification DfE has not yet set. That could narrow the market the framework was meant to open. The schools minister says the framework will promote competition and growth (Dyson, 2026). The Procurement Act 2023 requires DfE to have regard to value for money, and to the barriers small and medium-sized firms face (Procurement Act 2023, s. 12).

The Competition and Markets Authority (CMA) expects policymakers to check whether a policy or spending proposal limits the number or range of suppliers (Competition and Markets Authority, 2023). DfE should publish their competition assessment before the tender. It should show how the cost of Spine connections affects schools, and what that does to supplier numbers.

Spending on Spine connections is also at risk of waste. The Spine may fail a legal basis review. It may lose public trust, as the 2021 GP data programme did after more than 1.2 million people opted out in June alone. In either case, schools and suppliers will have paid for a route that cannot be used.

References

Carter, P., Laurie, G. T., & Dixon-Woods, M. (2015). The social licence for research: Why care.data ran into trouble. *Journal of Medical Ethics, 41*(5), 404–409. https://doi.org/10.1136/medethics-2014-102374

Children's Wellbeing and Schools Act 2026, c. 21. https://bills.parliament.uk/bills/3909

Competition and Markets Authority. (2023). *Competition assessment: Guidelines for policymakers*. https://www.gov.uk/government/publications/competition-impact-assessment-guidelines-for-policymakers

Computing. (2026, July). DfE confirms cyber attack exposed 607,000 records. *Computing*. https://www.computing.co.uk/news/2026/security/dfe-confirms-cyber-attack-exposed-607k-records

Data (Use and Access) Act 2025, c. 18. https://www.legislation.gov.uk/ukpga/2025/18

Defend Digital Me. (2026a, April 15). *National pupil data distribution: A review in 2026, and how to fix it*. https://defenddigitalme.org/2026/04/15/national-pupil-data-distribution-a-2026-review-and-how-to-fix-it/

Defend Digital Me. (2026b, November 9). *The NHS number as every child's lifetime national ID: A safer alternative to ContactPoint 2.0*. https://defenddigitalme.org/2026/11/09/the-nhs-number-as-every-childs-lifetime-national-id-a-safer-alternative-to-contactpoint-2-0/

Department for Education. (2023). *Requesting daily data from state-funded schools: Principles for collection and DfE use*. https://assets.publishing.service.gov.uk/media/6511356b2f404b0014c3d820/Requesting_daily_data_from_state-funded_schools_principles_for_collection_and_DfE_use__1_.pdf

Department for Education. (2024). *School attendance data collection impact assessment*. https://assets.publishing.service.gov.uk/media/66d83f677a73423428aa2f14/School_attendance_data_collection_DPIA.pdf

Department for Education. (2025). *Data protection ICO audit closure summary: 2025 update*. https://www.gov.uk/government/publications/department-for-education-dfe-data-protection-ico-audit-closure-summary

Department for Education. (2026a). *Academy trust handbook 2026* (para. 2.30). https://www.gov.uk/government/publications/academy-trust-handbook/academy-trust-handbook-2026-effective-from-1-october-2026

Department for Education. (2026b). *Core principles: School MIS procurement* (principle 17). https://www.gov.uk/government/publications/choosing-a-school-management-information-system-mis/core-principles-school-mis-procurement

Department for Education. (2026c). *Every child achieving and thriving* [Schools White Paper]. https://assets.publishing.service.gov.uk/media/6996ee6a047739fe61889e05/Every_child_achieving_and_thriving_web_accessible_version.pdf

Department for Education. (2026d, August 3). *Management information systems for schools in England* (Find a Tender notice 073140-2026). https://www.find-tender.service.gov.uk/Notice/073140-2026

Department for Education. (2026e). *MIS and Data Spine market engagement and supplier sessions* [Recorded webinars, 9 April to 19 October 2026]. YouTube. Transcripts 4, 6 and 7 https://docs.google.com/document/d/1mkYUerNCWyvScsIh8fg0lKEOR1fwNp8X8-oMdhHy9Ko/edit?tab=t.0 [Session 7 https://www.youtube.com/watch?v=Lt9Qudh4kK4]

Department for Education. (2026f, January 12). *Pilot to assess DfE-MIS data exchange for sector insight and policy decisions* (Find a Tender notice 002358-2026). https://www.find-tender.service.gov.uk/Notice/002358-2026

Department for Education. (2026g, March 26). *Preliminary market engagement: Management information systems for schools in England* (Find a Tender notice 027607-2026). https://www.find-tender.service.gov.uk/procurement/ocds-h6vhtk-05d135

Department for Education. (2026h).MIS Framework Deep Dive Session 6 on Terms and Conditions. https://youtu.be/g4HyVycHT1k

Digital Health. (2010, June 29). INPS and EMIS plan gateway. https://www.digitalhealth.net/2010/06/inps-and-emis-plan-gateway

Digital Health. (2013, August 12). TPP signs MIG contract. https://digitalhealth.net/2013/08/tpp-signs-mig-contract

Dyson, J. (2026, October 29). DfE pondered launching in-house MIS to save schools cash. *Schools Week*. https://schoolsweek.co.uk/dfe-pondered-launching-in-house-mis-to-save-schools-cash/

The Education (Individual Pupil Information) (Prescribed Persons) (England) (Amendment) Regulations 2013, SI 2013/1193. https://www.legislation.gov.uk/uksi/2013/1193/made

The Education (Information About Individual Pupils) (England) Regulations 2013, SI 2013/2094. https://www.legislation.gov.uk/uksi/2013/2094/made

The Education (Information About Individual Pupils) (England) (Amendment) Regulations 2022, SI 2022/599. https://www.legislation.gov.uk/uksi/2022/599/made

The Education (Information About Individual Pupils) (England) (Amendment) Regulations 2024, SI 2024/209. https://www.legislation.gov.uk/uksi/2024/209/pdfs/uksi_20240209_en.pdf

The Education (Pupil Information) (England) (Miscellaneous Amendments) Regulations 2016, SI 2016/808. https://dera.ioe.ac.uk/27217/1/uksi_20160808_en.pdf

Health and Social Care Act 2012, c. 7, s. 251A. https://www.legislation.gov.uk/ukpga/2012/7/section/251A

Health and Social Care Information Centre. (2015). *Data provision notice: Patient objections management*. https://assets.publishing.service.gov.uk/media/5a803f6f40f0b62302692641/Data-Provision-Notice_Patient_Objections_Management_19.10.15.pdf

The Health Service (Control of Patient Information) Regulations 2002, SI 2002/1438. https://www.legislation.gov.uk/uksi/2002/1438/contents/made

Independent Information Governance Oversight Panel. (2014). *Report to the care.data Programme Board on the care.data Pathfinder stage*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/389219/IIGOP_care.data.pdf

Information Commissioner's Office. (2022, November). *Department for Education warned after gambling companies benefit from learning records database*. https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2022/11/department-for-education-warned-after-gambling-companies-benefit-from-learning-records-database

National Health Service Act 2006, c. 41, s. 251. https://www.legislation.gov.uk/ukpga/2006/41/section/251

Phillipson, B. (2026, July 1). *Teacher workforce* (Written statement HCWS171). UK Parliament. https://hansard.parliament.uk/html/Commons/2026-07-01/WrittenStatements

Procurement Act 2023, c. 54, s. 12. https://www.legislation.gov.uk/ukpga/2023/54/section/12

Schools Week. (2026, November 5). DfE to test integrating NHS numbers into school systems. *Schools Week*. https://schoolsweek.co.uk/dfe-to-test-integrating-nhs-numbers-into-school-systems/

Tes. (2026, October 28). Sir Jon Coles: Data Spine an "extraordinary overreach" of government powers. *Tes*. https://www.tes.com/magazine/news/general/sir-jon-coles-warning-over-dfe-data-spine-plan-mis

Thinks Insight & Strategy. (2024). *Research on public attitudes towards the use of AI in education*. Department for Science, Innovation and Technology; Department for Education. https://www.gov.uk/government/publications/research-on-parent-and-pupil-attitudes-towards-the-use-of-ai-in-education