

POLICY & MARKET ANALYSIS

Reading the DfE's EdTech Market Assessment *alongside* *Why Education AI Must Be Open*

Alignment, gratitude, and where we differ. An analysis of DfE research report RR1638 (June 2026), read against the book by Matthew Woodruff and Lauren Thorpe.

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Executive summary

The Department's own market research, read against the open case for education AI.

The Department for Education's June 2026 market assessment (RR1638), produced independently by PUBLIC, maps the English EdTech market with care and restraint. Read alongside *Why Education AI Must Be Open*, its findings corroborate the book's central diagnosis point after point. That is welcome, and the response here is gratitude and collaboration rather than rebuttal.

The diagnosis is shared

The report names what the book named: fragmentation and data silos; vendor lock-in and switching costs; an evidence base "especially scarce for socio-economically disadvantaged students"; and an inclusion market that attracts the least investment (£8.6m) despite serving the highest need.

The keystone is the Department's own

In Appendix 2, the report records that the DfE "proposed an Open MIS Framework to improve procurement and data migration," and that the framework "is optional." That single word is the book's permissive-to-prescriptive argument, made by the Department against itself.

Interoperability is now foundational

The report lists interoperability among five enabling "horizontal" and finds the market moving toward "a modular ecosystem comprising interoperable components," which is the shape of the OEAI architecture, reached under commercial pressure rather than on principle.

Vendors are turning findings into infrastructure

EdTech suppliers building and co-building OEAI modules give schools access to their own data today, voluntarily and ahead of any mandate. They are doing in practice what the report says the market needs, and what its optional framework has so far only invited.

Where we differ is degree, not direction

The report's recommendations stop short of mandating openness through procurement. The book argues that voluntary frameworks have a twenty-year record of failure, and that procurement levers are the missing mechanism. The disagreement is about how far and how fast, not about where the sector should go.

The report is good evidence that the sector is closer to open, effective and equitable AI than it was. As the book argues, the decisive window is the next two budget years.

1 · Why I want to start with thanks

When you have spent years making an argument, the most reassuring thing is to watch an independent team, using different methods and different evidence, reach the same conclusions you did.

That is what this DfE report does. It is rigorous, careful and well grounded. It triangulates a landscape review of 60 sources, an expert “Lived Experience Board,” 58 stakeholder interviews and quantitative analysis of more than 1,000 companies and real school-usage data. It is clear about its own limits: the demand-side data is drawn from a single large multi-academy trust, and the authors say so. It repeatedly notes that naming a tool “is not an assessment of effectiveness, pedagogical value, or safety.” That restraint is what makes the places where it does reach a conclusion worth taking seriously.

So before anything else: I am grateful the Department commissioned this. Evidence-based market analysis of this kind is what the sector has lacked, and the fact that it largely corroborates the case Lauren and I make in the book is not a reason for triumph. It is a reason to build on it. The report is not an opponent to be answered. In most respects it is a witness for the argument.

What follows sets out how closely the two documents align, thanks the EdTech vendors who are turning that alignment into working infrastructure, and then states the handful of places where I read the evidence differently.

THE KEYSTONE FINDING · DfE REPORT, APPENDIX 2

*“DfE proposed an Open MIS Framework to improve procurement and data migration ... The proposed Open MIS Framework is **optional**.”*

That single word, ‘optional,’ is the argument of the book’s Chapters 2 and 7, made by the Department against itself. The rest of this analysis follows from it.

2 · Alignment at a glance

Ten findings from the report, set beside the position the book takes on each.

The DfE report finds...	The book argues...
Schools “manage multiple disconnected systems for registers, payments, and performance tracking, creating administrative burden and interoperability challenges.”	Chapter 1: “data everywhere, insight nowhere”; thirty systems, no way to answer “are we succeeding?”
Interoperability is one of five foundational “horizontals”: “preventing data silos and reducing administrative friction.”	Openness and interoperability are the organising principle of the whole sector, not a feature.
“ Vendor lock-in: ... switching costs can become significant. Schools may face technical challenges when migrating data between systems, as well as contractual barriers such as multi-year agreements.”	Lock-in, switching costs and data-export rights are the central market failure; cf. the Open Banking / CMA precedent.
“DfE proposed an Open MIS Framework to improve procurement and data migration ... The proposed Open MIS Framework is optional. ”	Chapters 2 & 7: optional standards have failed in UK education for twenty years (Becta/SIF, the ISB). Policy must move from permissive to prescriptive.
“Evidence on EdTech’s impact is inconsistent across learner groups and especially scarce for socio-economically disadvantaged students. ”	Chapter 6: a measured 47.4-percentage-point fairness gap for disadvantaged pupils that closed systems hid and only open architecture closed.
Stage 8 (Measuring and evaluating) is “the most frequently neglected”; usage data “reveals uncomfortable truths” about tools no one uses.	Chapters 5 & 8: trusts must move “from service desk to product team,” using usage analytics and outcome mapping.
Assistive & inclusive learning attracts the lowest investment (£8.6m) despite consistent demand; the third sector is “a necessary counterbalance to the market gaps.”	Educational infrastructure built with public money should be “a digital public good”; equity requires non-commercial stewardship.
ChatGPT and Claude are the most-used GenAI tools; adoption is “rapid and largely organic.”	Bourne interlude: ~78% of staff already using consumer GenAI (“shadow usage is everywhere”), with the same UK-data-protection caveat.
The market is becoming “a modular ecosystem comprising interoperable components ” (Jisc assessment framework).	The OEAI architecture is a modular ecosystem: connectors → packages → use cases.
The DfE should “publish a clear national EdTech roadmap ” because no framework “sequences adoption or defines system-wide priorities.”	Chapters 7 & 9: a hybrid model , sector-led infrastructure backed by government endorsement, funding and procurement levers.

3 · The shared diagnosis

Where the report and the book see the same world.

3.1 Fragmentation and silos are the problem

The book opens on a fictional trust drowning in “somewhere between a dozen core systems and thirty if you count all curriculum software,” unable to answer the simplest question a board can ask. The report describes the same room from the outside: schools “manage multiple disconnected systems for registers, payments, and performance tracking, creating administrative burden and interoperability challenges,” and “siloes systems that require manual data handling can create an ongoing administrative burden and erode confidence in digital tools over time.”

It even captures fragmentation within a single school: Exampro shows “an average of 2.75 contracts per school ... adoption at the departmental level rather than as a single whole-school system.” That is Chapter 1’s argument shown as a usage statistic.

3.2 Interoperability is foundational, not optional

Of the five enabling “horizontal” the report identifies, one is **Interoperability** itself, defined as “the ability of disparate systems (VLEs, apps) to exchange data securely, preventing data silos and reducing administrative friction.” Interoperability then reappears at almost every stage of the implementation journey: in Stage 3 (“schools then assess system fit, examining integration, interoperability, workflow implications, duplication”) and Stage 6 (a school that now “rejects [third-party tools] unless they support automated integration,” an “interoperability threshold”). This is the book’s thesis, surfacing on its own in the Department’s taxonomy.

3.3 Vendor lock-in and data portability, named outright

This is the passage I did not expect to read in a government market report, and it is worth quoting in full:

“Vendor lock-in: as digital platforms become embedded in school workflows, switching costs can become significant. Schools may face technical challenges when migrating data between systems, as well as contractual barriers such as multi-year agreements.”

That is, in all but wording, the problem Chapter 7 sets out to solve, and the reason the book proposes data-export rights, open APIs and “no contractual prohibition on sharing database copies with a successor vendor during migration.” Both documents reach for the same regulator: the report notes the wider direction of travel; the book grounds its procurement proposal in the **Competition and Markets Authority’s** scrutiny of data portability in education software, and in the Open Banking remedy the CMA mandated in 2018.

3 · THE SHARED DIAGNOSIS (CONTINUED)

3.4 The keystone: an “Open MIS Framework” that is “optional”

If there is one sentence in the report that the book could have written, it is in Appendix 2’s gap analysis. Under *Administrative & Monitoring Tools*, the “Change Observed” column records that “**DfE proposed an Open MIS Framework to improve procurement and data migration.**” The “Remaining Gaps” column then delivers the verdict:

“Interoperability across MIS, finance and safeguarding platforms remains inconsistent. **The proposed Open MIS Framework is optional.** Smaller schools face affordability and capacity barriers.”

That single word, “optional,” is the whole argument of the book’s Chapter 2 and Chapter 7. Chapter 2 sets out why optional, voluntary standards have failed in English education for two decades: Becta’s SIF-UK pilots collapsed when Becta was abolished and the dominant MIS vendor (then 80–83% of the market) had no commercial incentive to comply; the Information Standards Board produced 384 carefully specified standards by 2012 and achieved almost no school adoption, because there were “no procurement requirements mandating compliance, no consequences for non-adoption.” Chapter 7 turns that history into a prescription: move from permissive to prescriptive policy.

The DfE’s own researchers have now flagged that leaving the framework optional is why the gap persists. The book wrote the post-mortem in advance; the report records the symptom in real time. It is hard to ask for a clearer validation of the central thesis than the Department diagnosing, in its own appendix, the failure mode the book exists to warn against.

3.5 The evidence gap is an equity gap

The report is candid that the sector cannot currently see whether technology helps the children who most need it: evidence is “inconsistent across learner groups and especially scarce for socio-economically disadvantaged students.” Chapter 6 is the book’s answer to that sentence. The doctoral research it documents found a true-positive-rate difference of 47.4 percentage points between pupils eligible for Pupil Premium and their peers in an early-warning system, a system that was correct far less often for disadvantaged children. Standard mitigation techniques (threshold-tuning, reweighting, attribute removal) could not close it; only re-architecting the system to be open and inspectable could. The report says the evidence is scarce. The book shows why it is scarce, because closed systems hide this kind of disparity, and what makes it visible and correctable.

3 · THE SHARED DIAGNOSIS (CONTINUED)

3.6 Measurement is the neglected stage, and usage data tells the truth

The report’s implementation journey ends where most schools’ efforts end: Stage 8, “the most frequently neglected.” Its case studies are blunt and aligned with the book. One trust leader: *“You assume teachers are using it, and actually, when you look at the usage, they’re not. And yet you’re paying for something that’s quite expensive.”* Another, on impact: *“How consistent or evidence-based [is that judgment] beyond the gut feel of a lot of classroom practitioners? I don’t really know.”*

This is the transition the book documents at United Learning: a data team that “stopped thinking of itself as a service desk and started thinking of itself as a product team,” replacing a three-week manual reporting cycle with near-immediate insight, and a backlog where schools “request and upvote features.” It is also what one trust in the report has already started doing: building “an internal digital marketplace,” requiring suppliers to meet “specific data standards” so it can run “independent quantitative analysis, mapping platform usage data against mock exam results, to ensure technology investment is driven by pupil progress rather than only teacher time-saving.” Read that case study again and it is the OEAI model described by someone who has never heard the name.

3.7 The market failure in inclusion, and the case for the commons

Some of the report’s most important findings concern where the market does not go. Assistive and inclusive learning, serving the highest-priority pupils, attracts the lowest investment in the dataset at £8.6m, despite a consistent customer base. The report devotes a whole section to the third sector and concludes that non-profits “act as a necessary counterbalance to the market gaps,” a “safety net,” and that “the third sector provides the evidence and infrastructure needed to help the entire UK education system become more equitable.” That is a direct, evidence-based vindication of why Open Education AI is a community-interest company that moved to independent not-for-profit stewardship in January 2026, and of the book’s insistence that “educational infrastructure built with public investment should default to being a digital public good: open, inspectable, and reusable.” When the report later recommends that the DfE “assess the role of NGOs in the EdTech ecosystem,” that recommendation holds a door open.

3 · THE SHARED DIAGNOSIS (CONTINUED)

3.8 The same GenAI reality, including the same caveat

The report finds GenAI adoption “rapid and largely organic,” with **ChatGPT and Claude** the most-used tools and 44% of teachers using GenAI at least occasionally. The Bourne Education Trust interlude reports the same picture from inside a trust: roughly 78% of staff already using consumer generative AI, “shadow usage everywhere,” and the same worry the report raises under “Compliance and standards,” that general-purpose tools “were not always built with UK-specific educational standards or safeguarding architectures.” Bourne moved off consumer ChatGPT for that reason. Both documents see the same adoption, and both flag the same risk.

3.9 The market is drifting toward the book’s architecture

The report notes that the Jisc assessment-procurement framework now treats assessment “not as a single, monolithic product category” but as “a modular ecosystem comprising interoperable components,” and that foundational platforms are evolving into integrated systems with assessment as “a feedback loop directly within the learning environment.” That modular, interoperable, integrated direction is the OEAI reference architecture: connectors (modules) feeding a shared data lake, combined into packages that answer real use cases. The market is finding its way, under commercial pressure, to the shape the book argues for on principle.

3.10 We are reading the same policy moment

None of this alignment is coincidence. Both documents stand on the same recent policy scaffolding: the February 2026 white paper *Every Child Achieving and Thriving* and its “data spine”; the four-year EdTech evidence programme and the EdTech Evidence Board; the EdTech Testbed Programme; the September 2024 daily-attendance API; *Connect the Classroom*; and the commitment that all schools meet core digital standards by 2030. The report treats these as the landscape it is mapping. The book treats them as the platform it is building on, and quotes the white paper’s own line that data should “flow seamlessly, not be locked within individual systems.” The book is not arguing against the Department’s direction. It is standing inside that direction and pressing it one step further.

4 · Gratitude to the vendors building OEAI modules

The report's market tensions describe a single problem from several angles: lock-in and migration friction; silos and "interoperability challenges"; an "Open MIS Framework" that stays optional; and the SME founder's "unfair battle" to be heard over Big Tech marketing budgets ("In 2021, it was a click... now it takes ages"). Underneath all of it is one frustration: schools and trusts cannot easily reach, move and combine their own data.

An OEAI *module* exists to dissolve that frustration. In the book's technical reference, a module is a data connector to a single source system (an MIS, an assessment platform, a safeguarding tool, an HR system) that "handles the complexity of that connection... and converts the messy reality of vendor data exports into clean, consistent feeds into the central data lake." When a vendor builds or co-builds a module, every school using that system gains the ability to access its own data. That data lands raw in Bronze for a complete audit trail, is standardised in Silver against DfE/CBDS codes and the UPN, and is made usable in Gold, without bespoke integration and without per-record export charges. It does so under a guarantee the report's "data privacy and security" findings show schools badly need. OEAI as an organisation has no access to individual pupil records; "the framework manages the code and the schemas, not the data itself." Each trust's data stays isolated and under its own control, and the GPL-3.0 licence ensures improvements flow back to the whole community rather than into a new proprietary silo.

So to the EdTech vendors who have been in conversation with us, and who are building and co-building OEAI modules so that the schools and trusts on their systems can reach their own data: thank you. You are doing, voluntarily and ahead of any mandate, what the DfE report says the market needs and what its own Open MIS Framework has so far only invited. The book already documents some of this work: the Arbor connector co-built with United Learning; the Smart Grade assessment integration; Shireland ingesting cleanly from Arbor's Snowflake feed; the Bourne Education Trust's SEND agent built on the framework; the predictive-attendance work delivered for Inspiration Trust via Edequity AI. Every one of those is a vendor or system choosing openness as a feature rather than treating closedness as a moat.

This is also living proof of the book's most contested claim, that openness enlarges the market. Chapter 7 sets out the real case for vendor resistance (integration revenue, differentiation, first-mover cost) and then answers it: when openness becomes a shared expectation, "no individual vendor faces competitive disadvantage from compliance," new service categories emerge, and "schools that feel served become advocates." The vendors building modules today are showing that in practice. As the procurement appendix puts it, "where multiple trusts insist on the same clauses, vendors find that compliance is no longer optional in practice even when it remains so in policy."

That is the bridge between the report and the book: the report says the framework is optional; these vendors are making it real.

5 · Where I differ

Stating a disagreement plainly is worth more than papering over it. None of these is a contradiction of direction; they are differences of mechanism, emphasis and pace.

5.1 Optional versus prescriptive: the substantive disagreement. The report’s recommendations are soft-edged: publish a roadmap, promote under-invested verticals, embed consistent evidence expectations, explore data sharing, leverage existing communities. Most telling of all, the report identifies its own Open MIS Framework as optional and lists that as a gap, but does not then recommend making it prescriptive. This is where the book parts company. Its history (Chapter 2) is clear that voluntary frameworks in English education have a twenty-year record of failure, and its proposal (Chapter 7) is concrete: amend DfE-approved framework specifications for MIS, assessment and analytics to make interoperability a scored, weighted procurement criterion, on the model of NHS Digital’s mandatory FHIR compliance under the Health and Social Care Act 2012: “a procurement condition, not optional guidance.” I understand why a market-analysis report stops short of that; recommending regulation is above its remit. But the book’s reading is that the soft path is necessary and not enough on its own, and that it risks repeating the same failure the report’s own appendix documents.

5.2 What “open” means. The report uses “interoperability” and “data sharing” as technical and market features. The book uses “open” across four dimensions: open standards, open-source components, open governance, and open data sharing (a trust accessing its own data without lock-in). The report engages the first and last and is silent on open source and open governance. For the book those are not optional extras. Open-source code and inspectable governance are what make algorithmic fairness auditable (Chapter 6) and what make trust durable (Chapter 7’s “trust infrastructure”).

5.3 Description versus prescription. The report’s neutrality (“not an assessment of effectiveness, pedagogical value, or safety”) is the correct discipline for market analysis, but it means the report can diagnose without prescribing the cure with any force. Where it says assistive technology is “comparatively under-invested,” the book says closed markets structurally fail vulnerable children and that only open architecture closed a 47.4-point fairness gap. That is a stronger, normative claim.

5 · WHERE I DIFFER (CONTINUED)

5.4 “Safety net” versus core architecture. The report frames non-profits as a “counterbalance” and “safety net” filling gaps “where commercial incentives are low.” I would push back on the framing, not the facts. Open, sector-owned infrastructure is not a charitable patch at the margins. In the book’s argument it is the core architecture for the whole system, the well-resourced included. United Learning, the largest trust in the country, is not a safety-net case; it is a flagship one. Consigning openness to the third-sector fringe understates where it belongs: at the centre.

5.5 The limits of a GVA lens. The report sizes the market by company count, turnover, investment and Gross Value Added (£1.8–2.4bn). That is the right supply-side instrument, but it has a blind spot the book cares about. Shared, open infrastructure reduces commercial turnover by replacing dozens of duplicated, paid integrations with one shared, free connector. The value it creates (time returned to teachers, fairness gaps closed, the Michigan Data Hub’s roughly 24:1 return cited in Chapter 4) lands inside schools, not on a vendor’s balance sheet. The commons the book most wants to grow is partly invisible to a market-sizing exercise, because its success looks like less commercial activity, not more.

5.6 A roadmap without teeth. I welcome the recommendation for a national EdTech roadmap. But Chapter 2 is a cautionary tale about this. The Information Standards Board produced the most comprehensive roadmap imaginable, 384 standards, and almost no school ever used it, because a roadmap that “sequences adoption” is still only a plan. The book’s view is that a roadmap has to be paired with the levers that make the open path “the path of least resistance” (procurement scoring, platform rather than project funding, and accountability that recognises data maturity), or it becomes another well-meant document that the market politely ignores.

I would summarise all six as one difference. The report tells the sector, with great care, where it is. The book argues, with less restraint than a government report can afford, what it would take to get somewhere better, and that the decisive window, as Chapter 9 puts it, “is the next two budget years.”

6 · Conclusion

The narrow question of whether the report agrees with me is the wrong one to ask. What matters more is that an independent team, commissioned by the Department, has produced a careful picture of the English EdTech market, and that picture confirms the diagnosis at the heart of *Why Education AI Must Be Open*. Fragmentation is the core problem, lock-in is the mechanism that sustains it, interoperability is what is missing, the evidence for disadvantaged pupils is thin, and the market on its own will not fix the parts of the system that matter most.

Where we differ, we differ about how far and how fast: about whether the open path should be invited or required, whether openness is a technical feature or a founding principle, and whether shared infrastructure belongs at the margins or the centre. Those are real disagreements, and worth stating rather than smoothing over. But they sit on a foundation of agreement broad enough that the sensible conclusion is collaborative, not adversarial.

The vendors now building OEAI modules are already closing the gap between the report’s findings and its recommendations, making “optional” frameworks real one connector at a time, so that schools can reach their own data. The Department’s own recommendations to “assess the role of NGOs” and to “test approaches to data sharing and aggregation” are open doors that Open Education AI is ready and able to walk through.

So I will end where the book ends. When openness becomes ordinary, excellence becomes achievable, “because it works, not because it is mandated.” This report is good evidence that the sector is closer to that than it was. My thanks to the DfE and to PUBLIC for the work, and to the vendors building alongside us for proving the case in practice.

Continue the conversation

On reading the DfE’s findings alongside the open case for education AI, and on building modules that let schools reach their own data.

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