

Training music teachers in England – what is the music that is being taught in secondary schools? An opinion piece¹

Formación del profesorado de Música en Inglaterra - ¿Cuál es la música que se enseña
en las escuelas secundarias? Un artículo de opinión

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Abstract

This paper takes the form of an opinion piece by the English Author, and is written from an English perspective. The paper describes the training of music teachers in England, particularly with regards to the preparation of teachers to teach the National Curriculum. It describes the various pathways that prospective student teachers can take to become music teachers in England. Important in any consideration of what pre-service music educators is the nature of the curriculum they are being prepared for. This paper outlines the requirements of the curriculum, and explains how this is problematic in many ways, with the status of music knowledge being a particularly contested issue.

Key words: Pre-service teacher preparation; England; National Curriculum; Status of musical knowledge.

Resumen

Este artículo toma la forma de un artículo de opinión del autor inglés y está escrito desde una perspectiva inglesa. El documento describe la formación de profesores de música en Inglaterra, en particular con respecto a la preparación de profesores para enseñar el Currículo Nacional. Describe los diversos caminos que los futuros profesores en formación pueden tomar para convertirse en profesores de música en Inglaterra. Importante en cualquier consideración de lo que los educadores musicales en formación es la naturaleza del plan de estudios para el que se están preparando. Este documento describe los requisitos del plan de estudios y explica cómo esto es problemático de muchas maneras, siendo el estado del conocimiento musical un tema particularmente controvertido.

Palabras clave: Preparación docente previa al servicio; Inglaterra; Currículo nacional; Estado de los conocimientos musicales.

¹ This paper discusses the ways in which music teacher education takes place in England, and presents how this is a troublesome and problematic endeavour. It is important to note that the opinions expressed in this article are those of the Author. However, it is to be hoped that international readers will find these discussions helpful in contextualising what is taking place in their own countries, and will be able to think about the applicability in their own contexts.

1. The teacher training context in England

In order to be able to teach in schools in England there is a complex set of pathways to become qualified to teach. The training of music teachers in England is undertaken in accordance with government-prescribed regulations which affect provision. In recent years, government has overseen an increasingly fragmented system, with Universities, schools, and other organisations all having a role to play. Sometimes there is integration between these, whilst others are separated, and do not connect at all. As Robinson (2006 p.19) noted,

Policy, theory and practice in initial teacher education in England has a long history of turbulence...In the context of teacher training past and present, any sense of a coherent, consistent or united system of training, in which the various academic, practical and theoretical strands have been successfully reconciled has proved an elusive goal.

The place of music teacher training is part of the overall system for the pre-service preparation of teachers. Unlike the case that appertains in many other countries, there is no subject-specific and defined route for any of the subjects taught in schools, a qualified teacher is not certificated solely in their subject specialism, they are simply a qualified teacher, and can, in theory, be asked to teach across a range of subjects in schools. However, in order to prepare intending teachers for the profession, it is common for such student teachers to follow a pre-service preparation course which does focus in on their specialist subject.

In England, the very terminology in use is problematic for pre-service teacher preparation is problematic, with some using the word *training*, whilst others prefer *education*. There are both philosophical and practical differences in the meanings carried by these two terms, as Chitty (2009 p.259) observes:

[...] ‘education’ is all about transforming the mind so as to equip us for independent judgement and rational action; whereas ‘training’ should be directed towards practical skills for particular ends.

The positioning of these two words can be seen in the ways in which pre-service preparation in England is divided between being school-led, and university-led. This gives us two acronyms for becoming a teacher, ITE, for initial teacher education, and ITT for initial teacher training, although in everyday usage the two terms tend to be used interchangeably, with their semantic ‘baggage’ remaining unexamined.

The legal situation regarding qualifications to teach is this:

To teach in a state school in England, you must have a degree, and gain Qualified Teacher Status (QTS) by following a programme of Initial Teacher Training (ITT) (ucas.com, no date)

The teacher training route that is usually taken by teachers of all subjects in the secondary school, and music is no exception to this, is that of studying for an undergraduate

degree at university, conservatoire, or music college, and then undertaking a specific teacher training programme after this. However, this is not the only way into teaching, as figure 1 shows.

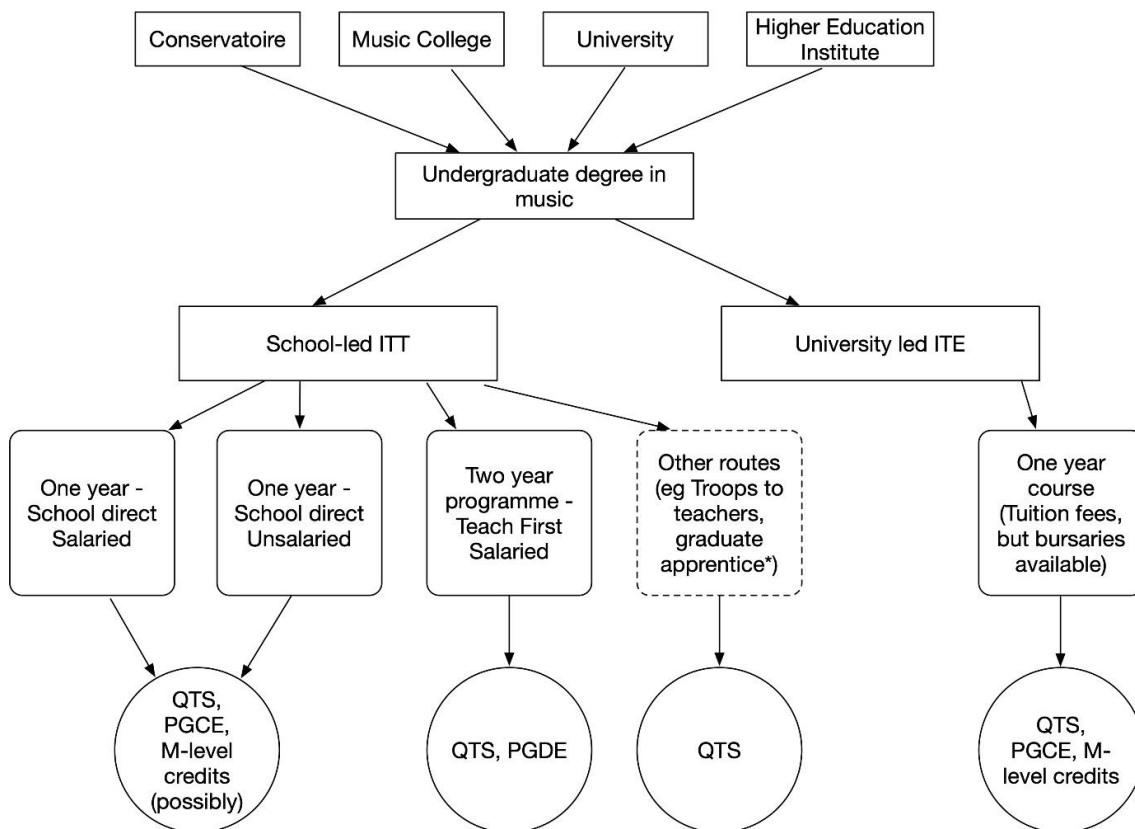


Figure 1. Routes into teaching in England (NB the asterisked items are beyond the scope of this current paper)

The diagram in Figure 1, drawn specifically for this paper, provides a visual representation of the various routes into becoming a qualified teacher in England that are currently available. There are a number of acronyms and terminologies employed in this, which are normal usage in the context. These are:

- ITT and ITE - already covered.
- M-level credits – PGCE courses can contain up to 60 credits at Masters’ level, PGDE programmes can contain up to 120 credits at Masters’ level.
- PGCE: Post Graduate Certificate in Education – this is a one-year full-time qualification which can be taken either full time in a University-led route, or part-time over a longer period of time in either a university-led or an employment based route. By itself a PGCE does not endow QTS on the recipient, although QTS is normally a part of the course. The student teacher

has to pass both the academic requirements for award of the PGCE, and meet the requirements for QTS in the form of the statutory ‘teacher standards’ (DfE, 2011). The PGCE pathway is still one of the most common routes into teaching.

- PGDE: Post Graduate Diploma in Education This is a two-year full time route which is normally followed by people on the ‘Teach First’ route, a specifically employment-based route with an emphasis on leadership.
- QTS: Qualified Teacher Status – this means that person is legitimately recognised by the government as being qualified to teach. It is important to note this is not a qualification per se, but is a status endowed after a suitable course, or specified experience in schools.
- Salaried means the route pays a wage to the person whilst training, unsalaried means it does not do this.

This number of potential pathways into teaching has come about as a result of governmental desire to ‘free up’ the system, and to promote competition. What this means is that there is a proliferation of routes, with choice – a key neoliberal mantra (Ball, 2012) – being afforded to the potential applicants. This has implications for a sector, as is the case in England, where teacher numbers have been historically controlled by the government, the various pathways having been told how many potential teachers they can recruit. However, despite the numerous ways into becoming a teacher in England, the various trajectories to becoming a teacher are routinely not being filled, with the results that often not enough new teachers are being created by this system.

Alongside governmental access regulations discussed, the PGCE qualification programme is similarly regulated. For example, one of the regulations states that trainee teachers of all subjects need to be in schools on placements for at least 120 days of their one-year training course. What this means is that trainee teachers tend to spend at least two-thirds of their training year out of the university undertaking practicums in schools, with only the remaining third of the year being spent back in university. As music graduates come from a wide range of undergraduate music programmes, including early music, music technology, performance studies, and musicology, to name but a few, the range of background knowledge, skills, competences, and understandings that students on a teacher training course encompass is very broad.

However, this does not mean that the PGCE is universally welcomed by policy makes. Back in 2010 the government’s schools minister noted, somewhat caustically “I would rather have a physics graduate from Oxbridge without a PGCE teaching in a school than a physics graduate from one of the rubbish universities with a PGCE” (Williams, 2010). It is probably this attitude which led to the move to break up the previous system in the first instance.

2. The National Curriculum for music in English secondary schools

Whichever pre-service route they have followed, music teachers who emerge into the English secondary school system will need to teach the National Curriculum for music in schools. Although there is a National Curriculum in place for music, it is not prescriptive. Indeed, for lower secondary school age pupils (11-14 years old) it amounts in total to only around 200 words in its entirety. The principal components of the NC are based on three inter-related aspects of music education, composing, listening, and performing. However, the entire content of the NC for the lower secondary school as published is contained in six bullet points:

Pupils should be taught to:

- play and perform confidently in a range of solo and ensemble contexts using their voice, playing instruments musically, fluently and with accuracy and expression.
- improvise and compose; and extend and develop musical ideas by drawing on a range of musical structures, styles, genres and traditions.
- use staff and other relevant notations appropriately and accurately in a range of musical styles, genres and traditions.
- identify and use the inter-related dimensions of music expressively and with increasing sophistication, including use of tonalities, different types of scales and other musical devices.
- listen with increasing discrimination to a wide range of music from great composers and musicians.
- develop a deepening understanding of the music that they perform and to which they listen, and its history (DfE, 2013, p.219).

As can be seen from these requirements, no specific forms or types of music are mentioned, there is no list of set pieces, songs, or listening; indeed, little is actually mentioned by way of musical content. However, note these two telling phrases:

- use staff and other relevant notations appropriately and accurately in a range of musical styles, genres and traditions,
- listen with increasing discrimination to a wide range of music from great composers and musicians (ibid).

It is these phrases which are important to consider, as they contain a number of ramifications and aspects of linguistic ‘baggage’ which require unpicking.

The first of these is the notion of curriculum, as this will matter both on placements during training, and when the pre-service teachers graduate and obtain a position in a school or college. Yet curriculum itself is a contested notion:

The history, social divisions and the many competing interests and value systems found in a modern society are expressed in the school curriculum as much as they are in its system of government or its occupational structure. Likewise, curriculum debates, implicitly or explicitly, are always debates about alternative views of society and its future (Young, 1999, p.56).

Ask a room full of people what they think the NC phrase “great” means in terms of music, and you are likely to get as many different answers as there are people in the room! Yet from the perspectives of the music curriculum in schools, it becomes clear that many of the aspects of what are thought of as being “great music” are subsumed with a school-based and exam-oriented system. Indeed, one of the key drivers in curriculum content for the lower secondary school is what happens in the upper school. To understand this, we need a brief foray into describing music lessons the English secondary school situation.

We have already seen that National Curriculum requirements for music are very brief - indeed, not only are they brief, they are also very broad in the way they can be interpreted and applied. What this means in practice is that many musical activities can be encompassed as being within the scope of the National Curriculum so long as they somehow include the three main required ingredients of performing, listening, and composing. The schooling system is divided into upper and lower secondary, with music being notionally statutory up until age 14, using the local terminology, until the end of Key Stage 3. At Key Stage 4, for pupils aged 14-16 years old, the curriculum splits into a series of core and optional subjects. Music is one of the optional subjects, and it is normally taken by less than 7% of the cohort (Daubney *et al.*, 2019 p.35). The examination that is taken at the end of this course is called the General Certificate of Secondary Education (GCSE), and the content of these GCSE courses, although changing year on year, is regulated by a non-ministerial government department, the office for qualifications (Ofqual). It is Ofqual who determine the overall strictures of what is and what is not permissible to offer for examination purposes at this stage. Where this becomes an issue is with the inevitable washback which occurs, wherein material which will be examined at age 16 influences what is taught up to age 14. This washback can skew the curriculum offer at KS3 by affecting what is taught to the 100% of pupils who do music at this stage, even though less than 7% will later go on to take the course.

It is probably worth mentioning at this point that there are no set text books for music as a school subject in England. Indeed, there are very few such books available anyway, and few schools can afford, or have access to class-sets of those that do exist. This compounds both teaching and training to teach issues, as there is no commonality of source materials that schools utilise, and that teacher education students can be trained to use as the basis of their lesson planning and delivery.

3. The status of musical knowledge

This discussion so far of what is going on in secondary school music classrooms is relevant to the training of future music teachers because of the key statutory requirement concerning the time which trainee music teachers spend in schools outlined above. With so much time being spent on placement it is inevitable – indeed, many would say desirable – that

what the trainee teachers see, do, and teach on their placements is directly informed by practice in the schools themselves. What this means for trainee music teachers is that with little standardisation as regards curriculum, their school experiences can vary wildly. However, what many will see in schools is the almost default way that music has come to be taught and learned in England. Bruner (1996) writes of there being a “folk pedagogy”, of common-sense and unchallenged ways of teaching; what we can see in England might easily be described as a “folk curriculum”, where, despite there being nothing by way of statutory requirement, a shared set of understandings seems to have emerged as to how best to organise music lessons in the lower secondary school. Fautley (2017a p.73) described how in two main cities in England, London and Birmingham, music teachers were asked whether they

... teach what might be called a topic or project-based curriculum in KS3?”, with a choice of three fixed responses to this question, ‘yes’, ‘sort of’, and ‘no’... [finding that] in London 94% and in Birmingham 92%, operate some sort of project-based curriculum.

It is this, the ‘topic’ or ‘project-based’ curriculum, that has come to form the way that music is normally organised in the lower secondary school in England. Despite this, the lack of commonality of approach or content means that if a child leaves one school, and moves to another, even if it is in the same region, there is little likelihood of them experiencing continuity of musical experience. The breadth of topics taught in schools is significant. In a study of the topics taught in London schools in 2016, the ‘top thirty’ subjects covered by a number of schools show considerable range in the topics, styles, genres, and content types covered. These were

Latin American Music; Medieval Music; Minimalism; Keyboard skills; Renaissance Music; Form and Structure; Ground Bass; Instruments of the orchestra; Samba; Graphic score; Hip Hop; Musical Futures; Adverts; Stomp; African Drumming; Viennese Waltz; Programme Music; Pop and Rock; Ukulele; Reggae and Caribbean; Singing; Pitch, Scales, Modes; Indian Music; Song-writing; Music Tech; Jazz; Film Music; Music Concrete; Gamelan; Blues (Fautley, 2016, p.25).

This listing of the top thirty – and there were 76 topics in all – shows the broad range of subject matter, all of which can be considered to meet the National Curriculum requirements for music.

Implications for music teacher training are significant; trainee music teachers will normally undertake at least two placements during their one-year PGCE programme. The contrasting school experiences are considered to be a positive aspect of the PGCE, but what it means in practice is that trainee music teachers can – and do – encounter approaches to music teaching and learning which may be both philosophically and practically very different from each other.

This important area of concern in music education takes us into another problematic area, that of policy makers and their views as to what sorts of music should be taught. Back in

1977 Shepherd *et al.* asked us to consider “whose music” was being listened to. Moving into the current century, Ruth Wright made this observation:

Despite the attempts of the education establishment to devise a syllabus which presents music as a subject for all, it is in fact serving few. It is perceived by many pupils as being elitist and by others as being insufficiently academically challenging. This leads to the question of whether GCSE serves pupils from all musical backgrounds. The answer would appear to be that it does not. A large number of pupils considered that the course was too classically based and did not include sufficient study of popular music (Wright, 2002, p. 240).

This begs the question as to whether popular music should be studied as an examination course. There have been those who disagree with this, for example, writing back in 1991, Morrison had noted that:

Music education in the state sector has been in a mess for 20 years. Old certainties of the post-1944 era classroom singing, a traditional grounding in classical music history and the rules of harmony and counterpoint were swept away in the late 1960s ... no amount of access to expensive synthesisers, or ‘project work’ on the life and times of Michael Jackson, can prepare a child half as well as the certain knowledge that All Cows Eat Grass. It is as basic to musical growth as teaching the meaning of tens and units to numeracy (Morrison, 1991).

What is taking place here is a tacit underpinning that some musical types, often western classical, are intrinsically more valuable than other sorts. The ‘All Cows Eat Grass’ comment – a mnemonic for notes in the bass clef – shows how the author is thinking about music; this is a point returned to later when notation is discussed.

The valorisation of music and musical types is a key topic in the anglophone world. This is not only philosophical; it is a discussion which pre-service teachers meet on a daily basis in their work in schools. As Powell *et al.*, (2017 p.734) note,

Education systems serve to perpetuate class divisions and structures, excluding the music and aspirations of many people through the imposition of an increasingly neoliberal ideology.

In the English National Curriculum, this has found its outworking by hegemonic privileging, as

...the cultural capital of the middle classes was placed at the centre of the national curriculum for music in England and Wales from its very inception... (Wright & Davies, 2010 p.41).

The status of musical knowledge is a complex matter, and England is not alone in struggling to reconcile the requirements of political and social matters; the status of musical knowledge, at least in England, is a matter which is both politically sensitive, and complex A past government minister for education in England, Michael Gove, made this observation about the sort of knowledge he felt should be included in the curriculum:

...I am unapologetic in arguing that all children have a right to the best. And there is such a thing as the best. Richard Wagner is an artist of sublime genius and his work is incomparably

more rewarding – intellectually, sensually and emotionally – than, say, the Arctic Monkeys (Gove, 2011).

However, this seemingly common-sense and straightforward view is actually anything but, as Spruce and Matthews observe,

[...] despite the introduction into the music curriculum of music from a much broader range of musical traditions and cultures than hitherto (including musical traditions and cultures from within our own society) the musical values inherent in western art music continue to be promoted as self-evidently defining ‘good’ music and consequently ‘high status’ musical knowledge, resulting in the alienation of many pupils from the formal curriculum ... despite the introduction into the curriculum of music from other traditions and cultures to try to address such alienation – the way in which these musics are typically presented sustains and reinforces rather than counters the western art music rooted conception of high status music knowledge (Spruce & Matthews, 2012, p.119).

It is the status of musical knowledge which is creating issues here. Young and Muller (2013) draw a distinction between ‘knowledge of the powerful’, and ‘powerful knowledge’, and this is important in the ways in which this stance of Gove is viewed. The positionality of Gove’s view, presented, as an artful politician can, as something which is superficially hard to disagree with, can be interrogated further:

This politician’s belief that, because his own life has been enriched and rewarded by his ‘persistence’ in ‘discovering’ Wagner, that same experience should not be denied to other people (specifically, young people from disadvantaged backgrounds), that it should be seen as an ‘entitlement’, and that enrichment such as Mr Gove has found can and indeed must be discovered by any young person via their own and their teachers’ persistence and hard work (and by turning their back on the false gods of so-called popular culture), is a not uncommon one ... It is only when we challenge this notion of intrinsic superiority (of some cultural artefacts and preferences over others), when we suggest that appreciation of the Arts is largely a matter of taste, and that similar rewards can be experienced by different people engaging with different material (we might politely enquire whether Mr Gove has ever listened to the work of the Arctic Monkeys, let alone given it the same ‘persistence’ as he has afforded Wagner), that we run into difficulties (Moore, 2014, p.83).

Indeed, Moore goes on to observe that

[...] making comments such as those of Mr Gove appear essentialist and exclusive rather than inclusive and caring (espousing equity, yet doing so via a missionary-like claim that the existing cultural preferences of some sections of society are superior to those of others, who must be taught to change their preferences by whatever means it takes), such questions raise other very important issues for curriculum philosophy and design: most notably, if developing a love of Wagner or Shakespeare is such hard work, and if it doesn’t pay off for large numbers of students ... on what basis are we not only including it in the curriculum, but perhaps even making it a compulsory — and testable — curriculum item? Are we genuinely seeking to ‘entitle’ our students to spiritual and aesthetic ‘enrichment’? Or are we simply attempting the impossible project of persuading them to be like and feel like ‘us’? (Moore, 2014, pp.83-84).

Moore’s notion of “to be like and feel like ‘us’” is a key one for our neophyte music educators, as they are likely to have spent much of their time, including the undergraduate years preceding their pre-service training being surrounded by people like them in conservatoires and

university music departments. But what such students need to made aware of is that statements and decisions about music have not arisen out of nowhere, they have come from people whose background, culture, education, and upbringing has formed them:

[...] musical judgments are never made in complete isolation. The formation of “taste cultures” has always been socially defined. Participation in certain genres of music—say, grand opera, street ballads, or rural folk music—was historically determined by a person’s social position, not by a purely independent aesthetic choice. Indeed, from a sociological perspective, taste is always a social category rather than an aesthetic one; it refers to the way we use cultural judgments as social “currency,” to mark our social positions (Johnson, 2002, p.12).

This area of taste and value judgements in music presents a minefield for the trainee teachers, as there is no simple way in which they can begin to address this issue, at the mercy, as they are, of the placement schools in which they will undertaking their practicums.

4. The pedagogy of musical notation

This lack of consistency takes us to another contentious issue in English music education, that of teaching and learning musical notation. This can be an issue in the ways in which notation figures as a problematized or uninterrogated component of music education:

Every year on the pre-service teacher education course with which I am associated in England, we have something we have come to refer to as ‘the notation argument’. When this happens varies, but it normally occurs fairly near the beginning of the course. In essence, what happens is that a divide opens up between those pre-service teachers who believe they need to teach western classical stave notation in isolation from other aspects of music, and that this needs to be done in advance of other musical activities, as preparation for them. The other group of pre-service trainee teachers counter this with the case that there should be some sort of a need for this knowledge, and that acquiring it in isolation is unlikely to happen anyway (Fautley, 2017b, p.123).

Teaching standard staff notation may seem like an unproblematic thing to some, after all, this is what western classical music is built upon. But this is to profoundly misunderstand the place and role of notation. Holder, amongst others, observes that to teach notation is to teach white supremacy:

If I were a racist,
I'd teach children that talking about music means,
Texture, timbre and tempo.
If you can't use these words, you're not a musician.
[...]
If I were a racist,
I'd insist that all music was taught from notation,
Removing all the nuances
That paper could ever express.
[...]
If I were a racist,
I'd teach that the Great Composers were

Mozart, Beethoven, Haydn and Bach,
Not Miles Davis, Florence Price, Alice Coltrane and J Dilla.
[...] (Holder, 2020).

This may seem an uncomfortable view to some in music education, but Holder is not alone in expressing this opinion:

Music theory is white...Music theory's white racial frame believes that:

1. The music and music theories of white persons represent the best, and in certain cases the only, framework for music theory.
2. Among these white persons, the music and music theories of whites from German-speaking lands of the eighteenth, nineteenth, and early-twentieth centuries represent the pinnacle of music-theoretical thought (Ewell, 2020).

But teaching staff notation is what policy requires, as has been seen the National Curriculum mentions “staff and other relevant notations” (Op. Cit). What teacher education students (and not only them!) sometimes fail to understand is that teaching notation in isolation from music making is *not* how people who actively use it have learned it. Learning staff notation normally takes place alongside learning an instrument or singing in the western classical tradition. It seems unlikely that someone would learn to ‘read’ music (as we say in English) without learning to ‘speak’ it as well. Simply knowing note names and lengths, and yet not being able to reproduce a melody from notation is of little use. Our foreign language colleagues do not teach reading alone without also teaching speaking. However, in England, the minister for schools is able to state this:

I want every child to leave primary school able to read music, understanding sharps and flats, to have an understanding of the history of music... (Gibb, 2019).

The unexamined ‘baggage’ which this remark carries within it demonstrates the cultural capital that lies within. Indeed, the notion of ‘cultural capital’ has itself become something of a political football in England, with Ofsted inspecting schools for it:

As part of making the judgement about the quality of education, inspectors will consider the extent to which schools are equipping pupils with the knowledge and cultural capital they need to succeed in life (Ofsted, 2019, p.43).

What is interesting here is Ofsted’s definition of cultural capital:

[...] the essential knowledge that pupils need to be educated citizens, introducing them to the best that has been thought and said and helping to engender an appreciation of human creativity and achievement (ibid).

This mixes the work of Matthew Arnold (1896/1993) – “the best that has been thought and said” – with the thinking of the American writer E D Hirsch (of whom it is known minister Gibb is a fan), “to be culturally literate is to possess the basic information needed to thrive in the

modern world” (Hirsch, 1987). This takes it some way from Bourdieu’s invention of the term, where he takes it to refer to

[...] the collection of symbolic elements such as skills, tastes, posture, clothing, mannerisms, material belongings, credentials, etc. that one acquires through being part of a particular social class (Routledge on-line, 2016).

Bourdieu also observed that cultural capital is problematic, and privileges some forms of cultural reproduction over others. This affects the ways in which curriculum is both conceptualised and operationalised, as Espeland (1999, p.174) observed:

Knowledge is the basis for power and power produces knowledge. Curricular reforms are... examples of a process where there is a close connection between the production of knowledge and power.

For pre-service education students in music, with the very few days they have in University to be prepared for teaching, alongside all of the less contentious things that they need to be inducted in, a crash-course in philosophy and sociology so they can understand the issues involved is normally a step too far.

5. Discussion

What these topics so far show is that the knowledge, skills, and competences required to teach music in the English system are complex and wide-ranging. In amongst the expected subject-specific requirements, there are also aspects of policy, hegemony, and cultural valuing that need to be thought about. Added to this already complex mix is the place of the teacher in delivery of a curriculum which has been designed by others, and which itself has arisen from the thoughts of others – including politicians – who have never been required to plan or deliver a music curriculum themselves. There is a danger here for overly simplistic assumptions to be made, accompanied by a lack of recognition that this may be a problematic area at all. This gives rise to a particular stance on curriculum as described by Moore and Young (2001, p.447),

[...] what we refer to as ‘neo-conservative traditionalism’. The idea of the curriculum as a given body of knowledge that it is the responsibility of the schools to transmit is as old as the institution of schooling itself [...]

Indeed, this view of curriculum, although seemingly obvious and value-free to its proponents, is actually far from that. All of which means that teacher educators need to tread a fine line between preparing new teachers for the profession, with all of the musical and social demands that doing so presents, and acting in a way which is politically neutral, so that it cannot be claimed that undue influence is being exerted.

Endnote

This paper has discussed the ways in which music teacher education takes place in England, and has presented how this is a troublesome and problematic endeavour. It is important to note that the opinions expressed in this article are those of the Author. However, it is to be hoped that international readers will find these discussions helpful in contextualising what is taking place in their own countries, and will be able to think about the applicability in their own contexts.

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