Policy Document Analysis: A Practical Educational Leadership Tool and a Qualitative Research Method

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Abstract

This paper presents policy document analysis as practical tool that can be put to valuable use by educational leaders and can also be adopted as a research method. Educational leaders are at the forefront of policy interpretation and consequently need knowledge and skills that enable them to analyse policy as part of their work in developing, implementing and reviewing organisational policy. They need to be able to look behind the policy to know what forces brought it into being; to tap into policy history to know how it was constructed; and most importantly, evaluate the way it is working to achieve its stated purposes. The analysis of policy documents is also an established and appealing qualitative research method, especially for students engaged in postgraduate research associated with educational leadership and policy studies because policy documents offer background insights into understanding educational problems in both research and practice. In this paper advantages and disadvantages associated with using documentary analysis as a qualitative research method are outlined and practical document analysis tools and approaches are presented.

Keywords: policy document analysis, education policy, educational leadership tool, research method, analysis framework, qualitative content analysis, discourse analysis

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Introduction

It would be true to say that almost all leadership and management activity in educational settings could be linked to some sort of policy initiative on a global, national or local scale. The role of organisational leaders involves making sense of policy and translating policy demands into practical actions that can be applied to achieve policy values. There is no such thing as a value-free policy: all policy has value-based intent (Busher, 2006; Stone, 2012). Leaders need not only to understand this; they must also acquire the skills to discern and achieve policy values. Alexander (2013) refers to eight key values that she believes educational leaders can prioritise according to a variety of philosophical orientations, and arranges these as *human* values of individualism and order; *democratic* values of liberty, fraternity and equality; and *economic* values of growth, efficiency and quality. School leaders regularly experience the tensions that arise between competing educational values such as excellence, choice, equity, and efficiency (Sergiovanni, Burlingame, Coombs & Thurston, 1999) all of which represent aspirations of Government and society that jockey for precedence and sometimes produce conflicting policy positions. The values of quality and accountability (Thomas & Watson, 2011) are at centre stage in current policy directions; and the value of improved student learning outcomes (Robinson, Hohepa & Lloyd, 2009) is currently strongly articulated in the educational leadership literature.

Educational leaders must be knowledgeable about policy because in educational organisations, especially those dependent on state funding, almost every function of the organisation is dictated by policy that has both national and local ramifications. Policy at a national level sets out broad statements that define a particular stance (United Nations Educational, Scientific and Cultural Organisation, 2013) and these Governmental level policies, in turn, determine organisational level policies or require the development of such policies, especially in self-managed school systems such as New Zealand (Cardno, 1999). It is consequently implicit that educational leaders should understand what policy is and why it is important. They need to be able to look behind the policy to know what forces brought it into being; to tap into policy history to know how it was constructed; and most importantly, evaluate the way it is working to achieve its stated purposes. Policy in its simplest sense is a guideline for action that is underpinned by a belief system associated with a particular value set normally aligned with a political or ideological position (Bell & Stephenson, 2006; Busher, 2006). However, for educational leaders, policy can be means for change and this requires active engagement with policy from documentation to action. According to Alexander (2013) educational leaders should consider the conditions they want to influence and change and the way in which policy can help them "pursue a better world" (p. 29).

Policy is important because in education it first and foremost determines the resources provided for educational endeavours (Razik & Swanson, 2001) and therefore leaders will always be interested in the public policy decisions at Government level that enable equitable education provision. The policy context is

complex because there are multiple stakeholders and many leaders. As Alexander (2013) states:

> The complexities of leadership are particularly apparent in education policy, where leadership takes several forms, from the teacher in the classroom to the principal of a building, to the administrators of a school district, to the school board members […], to the policymakers at the state level or their peers in the federal government. (p. 2)

The area of policy is also of great consequence for educational leaders as it creates the platform for all leadership and management activity which occurs around policy implementation. Everyone in a school is impacted by policy guidelines whether these are externally or internally determined. Leaders need to be aware of the demands created by external policy as they mediate between the external and the internal policy contexts (Busher, 2006). Internal policy development is the preserve of governance: a school Board of Trustees, in the case of New Zealand, who are the internal policy makers whilst educational leaders are the managers of policy implementation (Kilmister, 1993). Busher (2006) writing from a United Kingdom perspective ascribes internal policy making to school leadership teams and suggests that it is middle level leaders in schools who are the chief policy implementers. It is policy documentation that provides guidelines for practice and consequently policy documents need to be understood at a depth that enables capable action to ensue. Thus, educational leaders need skills that span the interpretation of purposes and recognition of the values that drive the policy; a critical appreciation of the construction and elements of the policy; and competent implementation, monitoring and review (evaluation) of the policy in practice. In short, educational leaders must engage with policy in a variety of ways and could make pragmatic use of the sort of guided policy document analysis framework that is presented in this paper.

Research that focuses on educational problems can make use of policy documents to understand the nature and sources of problems that are complex. As a research tool, policy document analysis is a method for investigating the nature of a policy document in order to look at both what lies behind it and within it. It particularly lends itself to being employed as a method in qualitative research projects. The kind of documentary analysis presented in this paper is centred on policy documents, therefore, the method requires some understanding of the nature and purpose of policy. The context for exploring the method has been limited in this paper to the arena of education policy in New Zealand that ranges across several levels. At the highest level is legislation that guides education provision nationally in the form of acts of Parliament. In the case of New Zealand this is the Education Act (2017). At the next level is national policy that applies widely and is often intended to generate organisational policy that guides implementation actions. At both the upper level of the administration of education (policy making, policy development) and the lower institutional leadership level (policy management, policy implementation) knowledge of the purpose and function of policy documentation is essential in the process of scru-

tinising and analysing policy documents. The rest of this paper is structured to introduce the nature of policy documents with particular reference to levels of policy documentation in the context of performance appraisal in New Zealand schools. The advantages and disadvantages of the documentary analysis method are discussed, followed by presentation of a framework for conducting analysis of an organisational policy document. An approach to content analysis is outlined to provide a practical resource for analytic activity that could be appropriate in either research or practice in educational leadership settings.

Advantages of documentary analysis

As a research method documentary analysis recommends itself to many qualitative researchers as straightforward, efficient, cost-effective and manageable. Its major advantage is the availability of documents, usually at little or no cost to the researcher. By working with documentary data rather than data collected from human subjects ethical approval to access the data is seldom needed, thus researchers can circumvent the need to make applications for ethical approval to conduct a study; a process that might involve complications or delay. This does not mean that documentary researchers have no ethical concerns however, because to gain access to documents that may be confidential to staff for example, the researcher needs to obtain the organisation's permission to use the document for expressed and ethical research purposes. A further advantage is the unobtrusive nature of documentary analysis that makes it non-reactive (see for example, Bowen, 2009; Bryman, 2012). A document as the source of data does not draw attention to the researcher's presence as they can quietly work behind the scenes.

As a qualitative research method, documentary analysis is often chosen as a second or supplementary way of collecting data in order to add rigour to a study through a multi-method form of triangulation. Thus it is common to find that studies employing qualitative methods such as interviews or participant observation within an interpretive epistemology will also use documentary evidence as an additional source of data when this is both relevant and feasible (Bryman, 2012; Forster, 1994). In fact, a rationale for choosing to use documentary analysis is its appropriateness as a second research technique. Unless it is employed in ethnographic, linguistic or historical research for example, it is seldom used as the sole method. Bowen affirms this by stating:

> The rationale for document analysis lies in its role in methodological and data triangulation, the immense value of documents in case study research, and its usefulness as a stand-alone method for specialised forms of qualitative research. […] In other types of research, the investigator should guard against over-reliance on documents. (Bowen, 2009, p. 29)

Disadvantages of documentary analysis

The documentary researcher needs to be aware of some of the shortfalls of relying on documents as sources of evidence. It is not always possible to retrieve a document. It may be protected in the sense that access is deliberately blocked.

Another disadvantage with some kinds of documents is that they may be difficult to locate and access for geographical reasons. Because documents are not produced specifically for research purposes, they may contain insufficient detail to be of use – especially when the research project is relying exclusively on documentary sources of data. A case in point is the collection of a set of organisational policies from a variety of institutions that are available on the internet. Whilst this provides ease of access, it is not easy to authenticate the currency of these documents. Hence, as well as obtaining the policy documentation from a website or downloading it in print form it may be necessary to contact the organisation to check that these are indeed the most up-to-date versions of the document. There is also the question of how accurate the document may be. Its authenticity may be questionable. Merriam (1998, p. 125) cautions there are cases when "public records that purport to be objective and accurate contain built-in biases that a researcher may not be aware of".

A concern that a collection of documents may not be complete could attend the selection of documents for a particular study. The researcher can overcome a limitation known as "biased selectivity" (Yin, 1994, p. 80) that is related to incomplete sets of documentation by becoming aware of both what is available and what is not available and why. In the case of organisational policy documents it is important to remember that policy at the institutional level is often generated by external or state mandates and that the antecedent policies (those that give rise to a need for institutional policy) may themselves need to be accessed. Furthermore, policies generate a spate of documents related to their implementation in organisations. These subsidiary documents in the shape of procedures, regulations and reports of a variety of activities also constitute the essential policy documents that need to be assembled to create a complete collection for analysis. Leaders in educational organisations need to be aware of the extent of documentation that radiate from policy in the form of procedures and guidelines for implementation – all of which must be included in effective reviews of policy.

The nature of education policy documents

This paper has been written to locate the method of documentary analysis within the context of education policy-related documents that are pertinent to educational settings existing at both the level of the state and at the organisational level affected by state policy. Whilst many of the general aspects of the research method called documentary analysis apply in this context, there are some contextual particulars that pertain to policy documents, creating a need for singling out the nature of the documents themselves as a start to understanding how this method can be most effectively applied. Policy documents are only one of a myriad of documents types. The form and language of documents differ widely and as Atkinson and Coffey (2004) suggest, "certain document types constitute […] *genres*, with distinctive styles and conventions" (p. 59). It is important to acknowledge the distinctive nature of educational policy documents by isolating specific features that apply to this particular genre of documents.

Policy documents are produced in the arena of politics and policy (Lingard & Ozga, 2007) that constitute a major intellectual field in the form of Policy Studies which is a multi-disciplinary academic field associated with such disciplines as economics, sociology, history, political studies and education. The study of policy in this wide sense incorporates policy theory, policy process, policy analysis and policy evaluation. Public policy (produced by governments) and organisational policy (produced to guide the professional, commercial and industrial sectors) contribute a vast collection of documentary material or 'policy text' which is the focus of policy studies. At a macro level, large-scale policy document (or text) analysis must be distinguished from the micro exercise of analysing policy documents in use at the organisational level as a method for research or leadership understanding of policy – which is the focus of this paper. In policy research a well-known conceptual framework for policy analysis was proposed by Taylor, Rizvi, Lingard, and Henry (1997) and has been built upon subsequently by several other policy theorists (see for example, Bell & Stevenson, 2006; Busher, 2006). It involves a study of policy from three aspects: context, text and consequences which are elaborated below.

Policy context is about the forces and values that have driven a policy to come into being. This relates to the socio-political environment and requires understanding of the antecedents of the policy; the issues and pressures that gave rise to a need for the policy in the first place. What is being considered is the genesis and history so that the policy background can be established. For example, one should search for information on how the government policies in a particular area relate to previous policies and powerful people (Bell & Stevenson, 2006; Busher, 2006)

Policy text is the content of the policy document and the core focus of analytical activity. It is this text that needs to be subjected to detailed data analysis, especially in qualitative research where the issue is not the mere counting of words but the questioning of the text as one searches for answers. As Bell and Stevenson (2006) assert, we need to interrogate the text to find out why it is structured or framed in a particular way. Questions about the purposes and the values that underpin the policy should be posed. We need to look behind and beyond the words to draw inferences that may link to theories about the policy arena and consider both what is said and what is not. We also need to consider how the policy could be interpreted from a variety of standpoints. It is this kind of deep, detailed, textual analysis that is the work of the qualitative researcher (Silverman, 2006).

Policy consequences are related to the way in which a policy is implemented. Policy implementation practice is also affected by the way the users of the policy interpret it (Ryan, 1994). We need to consider the effectiveness of procedures documented to give consistent guidance in how the policy is implemented (Ng, 2016). We should also be looking for signs of likely challenges to implementing the policy which could be related for example to people, processes, or structure (Alexander, 2013). Invariably this aspect of the analysis is akin to evaluation of the policy in practice and is often referred to the literature as policy review (Kilmister, 1993).

The exercise of engaging in the analysis of an organisational policy document may require the practitioner or researcher to scrutinise the document with all three of these aspects in mind. Very often the need to review a policy is the catalyst for engaging in policy document analysis. Questions about the context of the policy, its background and rationale will arise and the answers may lie in within the text of the policy document in the form of references to political or economic forces that confirm the context. The text itself is the substance of analysis and this may also yield information about policy construction, interpretation and implementation issues. It is important to remember that documentary analysis method is invariably employed along with other qualitative methods so that issues, surprises or omissions within policy documents can be investigated using other research tools such as interviews, for example. From a practitioner's perspective this conceptual framework is a vital reminder to revisit the purpose and value-base of the policy, to scrutinise the text related to both policy and procedure and to evaluate the consequences in order to judge the effectiveness of policy implementation. For educational leaders, deepening an understanding of policy beyond superficial engagement with the text can be useful when communicating a policy, managing its implementation and reviewing it.

Policy documents in the context of performance appraisal

This paper narrowly focuses on policy documents that are located in educational organisations and specifically those documents that are related to practice, procedures and policy, and related strategic and legislative documentation in educational settings. Policy documents are often sandwiched between the higher-level strategy tier that sets direction for policy formulation from within or beyond the organisation, and the operational tier of policy implementation that is concerned with procedure and process (Cardno, 2012). As such, the analysis of an organisational policy will require attention being paid to forces that brought the policy into being, the policy itself, and the policy's usefulness or impact. Therefore, when going in search of policy documentation within a specific organisation, educational leaders or researchers will need to conduct a search at several levels. Table 1 below uses the context of performance appraisal of teachers in New Zealand schools to demonstrate the kind of policy documents that exist at the external strategic level, and the internal organisational level of policy and procedural documents.

Table 1

Levels of Organisational Policy Documents – An Example of Performance Appraisal Policy in New Zealand Schools.

Strategic level documents	National and institutional documents
	– Legislation – State Sector Act (1988)
	– Gazetted regulations for performance appraisal: The New Zealand Gazette (1997)
	– Performance Appraisal in Schools Guidelines (Ministry of Education website)
	– Standards for the Teaching Profession and the Code of Professional Responsibility (Education Council New Zealand)
	– National Administration Guidelines (Ministry of Education website)
	– School Charters and Strategic Plans (Education Standards Act, 2001)
Organisational level policy documents	Policy documents with titles such as:
	– Staff appraisal / performance appraisal
	– Performance management
	– Performance appraisal and development
	– Human Resources (HR) policies
	– Policy for policy development and review
Organisational level procedure documents	Procedures for appraisal activity such as:
	– Timeline for meetings and communication
	– Classroom observation, self-appraisal portfolio development, annual development plan, individual appraisal reporting
	– Teacher inquiry guidelines
	– Reporting on school-wide policy implementation
	– Review of policy

Practical tools for policy document analysis

Practices for policy document analysis could be enhanced by using tools to guide the analysis. Two tools are presented here. Firstly, a set of questions for organisational policy analysis and secondly, an exercise for undertaking the analysis of an educational policy. The major emphasis is on the text but all aspects of how a policy comes into being and how it is translated into practice are important. These tools can be utilised by educational leaders in the course of both policy review and development; they can also be utilised by researchers in applying documentary analysis as a method.

The tool in Table 2 is structured around five aspects which are highlighted as important in several policy analysis texts (Alexander, 2013; Bell & Stephenson, 2006; Busher, 2006). The aspects that need to questioned are: (1) document production and location; (2) authorship and audience; (3) policy context; (4) policy text; and (5) policy consequences. To address each aspect a range of questions are proposed to assist critical probing. The answers to questions should lie within the policy text itself, or could be noted as omissions from the policy. Because policy is not value-free identifying the values (both implicit and explicit) in the policy and tensions between values) allows the analysis to probe the policy to uncover forces or drivers that influenced inception and impact expectations.

This type of analysis is based on a prior understanding of the policy environment. Consequently, an expectation of policy document analysis is that the educational leader or researcher has familiarity with not only the policy document but also a literature base that provides knowledge about the policy arena under study. A review of the relevant literature is normally undertaken prior to document assembly and analysis. This provides a theoretical platform for devising the specific questions that will be formulated to guide the scrutiny of text in the document. Whilst acknowledging that few educational leaders (unless they are students in a policy analysis course) would have the resources or interest to go to this depth, it is nevertheless important that they are made aware of the background provided by a pertinent theory-base.

Table 2

Questions for Organisational Policy Analysis

- **Document production and location**

Why was the document produced? Where was the document produced and when? Where was it located? Was it easy or difficult to access?

- **Authorship and audience**

Who wrote the document? What is their position and do they have a bias? Who was it written for?

- **Policy context**

What is the purpose of the policy (for the organisation or the state)? Are drivers or forces behind the policy evident? What values underpin and guide the policy and are these linked to local or national strategic and quality issues? Are there multiple values that might create tensions?

- **Policy text**

How is the policy structured and how does the text provide evidence of its construction or development? What are the key elements of the policy and are they associated with local or national legal or regulatory requirements? Are there related procedures specified in the text that provide guidance for practice?

- **Policy consequences**

What is the intended overall impact of the policy? How is policy implementation intended to be monitored? How and when is the policy to be reviewed? How does the text draw attention to important aspects of practice related to the policy?

The tool in Table 3 guides content analysis of the document with a focus on purpose of the policy, how the policy was constructed and issues related to its implementation and subsequent impact. This tool is also designed to be used either by educational leaders or by researchers. Educational leaders should adopt a collaborative approach with appropriate stakeholders focusing on a single policy document that requires review. For the researcher, the approach would be to select several policies for systematic analysis using this exercise.

Table 3

Policy Content Analysis Exercise

Educational leaders' approach	Researchers' approach
Educational leaders should consider using this exercise in a collaborative approach to policy review. This could involve working with school governors or with a senior leadership team.	A researcher could assemble several policies and then scrutinise these from the three perspectives provided in the exercise.

Policy purpose analysis

Closely read your policy document and identify words or phrases that refer to:

– The purpose of the policy

– The values that underpin or guide the policy

– The local or national strategic and quality issues

Policy construction analysis

Closely read your policy and identify sections, words or phrases that provide evidence of:

– The way in which the policy is constructed

– The component elements of the policy (check compliance with legal or regulatory requirements)

– Responsibility for policy development

– The way in which constituents/stakeholders participated in development

Practice implementation and impact

Closely read your policy and identify words or phrases that relate to its actual implementation and in addition use your experience of the policy in practice (or seek views from others involved in its implementation) to comment on:

– Its overall impact

– Current strengths and positive aspects of the policy in practice

– Current concerns and negative aspects of the policy in practice

Document content analysis

Content analysis as a research technique is frequently referred to in the literature as analysing the words, language or text in documents (see for example, Bowen, 2009; Bryman, 2012). It is fundamentally associated with the quantification of content in pre-determined categories. As a quantitative research strategy it

has a long tradition of use in relation to conversational analysis and print analysis where the systematic and objective application of rules yields robust results in terms of what is evident in the text. Frequency analysis is the cornerstone of quantitative content analysis and provides a rigid procedure for making content-descriptive judgements.

From a qualitative perspective and particularly in relation to the analysis of content in organisational policy documents this 'word count' or statistical approach is not appropriate other than as a broad brush overview of the document to isolate the frequency with which some terms are used. Content analysis can be employed in a less rigid, more flexible manner in qualitative studies when researchers draw inferences from the content by acknowledging the mere presence or absence of certain words or phrases. George (2009, p. 145) expresses this notion as follows:

> We employ the term "non-frequency" to describe the type of non-quantitative, non-statistical content analysis, which uses the presence or absence of a certain content characteristic or syndrome as a content indicator in an inferential hypothesis. In contrast, a "frequency" content indicator is one in which the number of times one or more content characteristics occur is regarded as relevant for the purpose of inference.

When frequency-counting is no longer the main task of the analyst it allows for a more holistic study of content and as Kohlbacher (2006, p. 16) asserts, "context is also central to the interpretation and analysis of the material. In fact, it is not only the manifest content of the material that is important but also the latent content". From a qualitative perspective, there is a need to consider what may lie in, beneath and around the text in terms of themes that might be conveyed by or inferred from the words themselves. Context is particularly important in the analysis of policy documents and is consistent with what this method draws on in terms of utilising policy studies resources (see for example, Bell & Stevenson, 2006). It should be noted that in the use of qualitative documentary analysis there is almost always a study of the theory base in the form of pertinent literature. This review of theory and research can be drawn upon by the analyst to probe not only the text but its meaning (Scott, 1990; Silverman, 2006).

It is important to analyse the content of organisational policy documents to establish not only what is said but also what is not said. A content analyst should be able to distinguish clearly between what is content description and what is being inferred from the content. In this sense it is an approach that is extremely well aligned with the broad directions for policy analysis in general which confirm the importance of the three facets of context, text and consequences. In relation to each facet of the content analysis the following questions should be posed. The task of the analyst is to answer these questions with reference to a) the actual text in the policy and b) the critical issues that are raised in the literature surrounding the policy.

Content analysis – guiding questions

1. What aspects (that you are looking for) are evident in the language of the policy?
2. Does the policy language refer to these aspects directly or indirectly?
3. What is specifically stated in the policy?
4. What is not stated in the policy?
5. How does this align with legal or regulatory requirements?
6. How well does your local policy reflect national or international policy trends and purposes?

At the very heart of content analysis is the coding of text to extract categories and themes. There is also a need for the content analyst to be aware that content can be analysed in two different ways: either inductively or deductively. In an inductive approach to the analysis the close reading and re-reading of the document allows the researcher to extract categories from the data itself. Seeing repeated word patterns, similar phrases and ideas is the basis for creating a structuring of categories which may lead to sub-categories or themes being recognised within these categories. The document is often annotated with headings that occur during several readings of the text and these may be refined to provide a coding guide. However, in a deductive approach categorisation is already established and occurrence of text that fits these categories is the focus of the analysis. Very often a model, theory or themes established through a literature review are the basis for constructing what Elo and Kyngas (2008) refer to as either a structured or unstructured matrix of analysis that is the basis of deductive content analysis.

In relation to the analysis of content in an organisational policy document it is most likely that broad categories of content relevance have already been established before documents are scrutinised. In qualitative research, especially when documentary analysis is an additional method, this tends to be the case because the literature and/or other data (within the same project) suggest a frame of reference to apply to document text analysis. The actual analysis activity as described by Bowen (2009, p. 32) "involves skimming (superficial examination), and interpretation. This iterative process combines elements of content analysis and thematic analysis". According to this author, the purpose of content analysis in document research is to organise information into categories whilst thematic analysis requires patterns within the data to be recognised and these become emerging themes. As Kohlbacher (2006) points out, the category system lies at the core of qualitative content analysis. In the same way in which qualitative data in interview transcripts can be coded to identify categories and themes, documents lend themselves to codification yielding thematically analysed data that can be meshed with data collected from other sources.

A particular challenge of qualitative content analysis is that there are no simple guidelines for data analysis and each inquiry is different if not unique

(Elo & Kyngas, 2008). Consequently, it is almost impossible to offer specific techniques to documentary researchers working in the context of organisational policy documents other than suggesting that they the follow steps involving 1. preparation for the analysis; 2. decisions about the approach to categorisation; 3. description of context; and 4. dealing with the document text and inferences. The all-important work is to engage in scrutiny of the text. Using a guiding framework of questions helps to ensure that the key areas are included.

Content analysis is undoubtedly the most appropriate approach to adopt in relation to organisational policy documents. It is a manageable approach for educational leaders to adopt. For researchers it is can be conducted in a way that is epistemologically consistent with qualitative research values. For the qualitative researcher who wants to extend the depth of analysis a further dimension to studying a policy document can be provided through discourse analysis technique.

Document discourse analysis

Discourse analysis fundamentally differs from content analysis in that it is about the analysis of 'language-in-use' and is "concerned with the description and analysis of both spoken and written interactions" (Paltridge, 2006, p. 3) in which "language is seen as playing an active constructive role" (Marshall, 1994, p. 92). Most often associated with the arena of socio-linguistics and critical social and cultural studies, discourse analysis is presented in a variety of forms and is a popular research method employed in studies of the social world of language. Critical discourse analysis, according to Bryman (2012), is a variant of discourse analysis influenced strongly by critical theorist Michael Foucault. It "seeks to link language and its modes of use to the significance of power and social difference in society" (p. 528). In particular, critical discourse analysis is attributed to the seminal work of Foucault on knowledge as power and the connections between discourse and the dynamics of social systems and structures (Dick, 2004; Perryman, 2012; Phillips, Sewell, & Jaynes, 2008). Perryman (2012, p. 310) asserts that "discourse in social structures creates new truths, the specialist knowledge which gives power to those who hold it".

Dick (2004) states that the notion of discourses is associated with how individuals use language in social contexts and that "discourse constitutes the identity of the individual, the relationships between individuals and the ideological systems that exist in society" (p 205). This is a view she attributes to Fairclough (1992) who proposes that discourse analysis proceeds along three dimensions: text, discursive practice and social practice. Thus, as an approach to documentary analysis it meets and also far exceeds the bounds of what is required regarding the analysis of documentary content. Uncovering the socially constructed context of the written and spoken word is the objective of discourse analysis. Its whole emphasis is on the underlying meanings and power relationships that can be attributed to the text-in-use, which takes the analysis exercise to a much deeper and

more critical level than that expected of content analysis which begins and often ends with the manifest text.

As Bryman (2012) reminds us, there is no single or agreed version of discourse analysis. It is an approach that can be applied to oral and written language, however as a term that relates to the analysis of document texts, it is less recognised than content analysis. An exception is the employment of documentary discourse analysis in a study undertaken by Perryman (2012) who used this method in her study of a collection of school documents related to external quality inspection by Ofsted (the Office for Standards in Education, Children's Services and Skills in the United Kingdom). What she describes as the activity of document discourse analysis bears considerable resemblance to what Bowen (2009) describes as the scrutiny of document content to identify categories and themes.

> I was particularly interested in how the school documentation mirrored the language of Ofsted. In order to identify the actual words and phrases I regarded as the language of Ofsted, I examined in detail the framework for inspection, compared this with the school's inspection reports and literally highlighted and counted recurring words. I then created a list that I could look out for in the school's documentation such as 'standards', 'policy', 'quality', 'teaching and learning'. Beyond this mechanistic process, I was also interested in looking for tone and mood. (p. 315)

In this study, the discourse analysis extended beyond documents to primary sources of data such as transcripts from interviews and questionnaire responses. Nevertheless, the reference to discourse analysis in this study is noteworthy. Discourse analysis is described as an approach to the analysis of language involving looking into the text for patterns or themes and also considering the socio-cultural contexts that give rise to the text itself. In other words, it expects the researcher to focus on what lies beyond the language itself and to consider the relationship between the social world and the way in which language is used (Bryman, 2012; Paltridge, 2006). This notion of looking beyond the actual words, phrases, or sentences that constitute communication can be an attractive one to transfer to a study of the language of official documents, and particularly to an analysis of the context aspect of institutional policy documents and inferences that apply to implementation issues. In both of these arenas the analysis deepens beyond what is manifest in text to embrace the latent messages (Duriau, Reger, & Pfarrer, 2007).

What counts as important in policy document analysis

As a qualitative research method an analysis of organisational policy documents provides a most easily accessed and cost effective way to collect and analyse data using an additional method in a small scale or case study project. As a leadership tool, the ability to scrutinise and interpret a policy document lends integrity to the task of policy implementation and adds depth and credence to policy-related leadership activity.

For educational leaders it is critical to develop and hone the skills of practical policy analysis as this is an expectation of leadership capability. Organisation level policy requires development, monitoring, review and constant interpretation into practice. If leaders are knowledgeable about the basics of policy analysis and know how to scrutinise and evaluate a policy document, then they can lead other key stakeholders in collaborative approaches to this work.

Embarking on a document analysis exercise without having established a conceptual or structural framework for the analysis is likely to lead to confusion and an unconvincing report of the analysis. A framework allows selected aspects of the policy to be evaluated based on the particular arena in which the policy operates. For example, in this article where performance appraisal policy in an educational setting is referred to, the conceptual framework suggested integrates elements that help us judge the quality of the documentation in relation to three fundamental elements of policy analysis: context, text and consequences (Taylor et al., 1997; Lindard & Ozga, 2007). In each case the essential initial task is to connect with the relevant literature to determine an appropriate framework for analysis. The tools for analysis include guidance about judging policy quality and approaching the analysis in a structured way and these are highly recommended for use by educational leaders in the process of policy development and review activities.

An understanding of the method of policy document analysis could be both insightful and useful for the people who make and use policy because policy needs to be regularly reviewed and updated to meet the current needs of an organisation. Hence, it is suggested that policy document analysis can be put to practical use by educational leaders and those with educational administration responsibility to develop and review policy. The method is also attractive to students and first-time researchers wishing to employ a second research method to establish background evidence or contextualise a study especially when related to a specific genre of documentation. In summary, policy document analysis is purported as having valuable practical application in a formal research setting, and as a tool that can be used by educational leaders with raised awareness of policy complexity and policy implementation challenges which could consequently improve the quality and outcomes of policy at the organisational level.

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