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From the APL Library

1984: Spot the small points

Any point, however minor, that you come across in practice and consider needs scrutiny or reform.

Pension Lawyer No. 1

1999: Technical input, not policy lobbying

113:4 in favour of working with Government *with a view to simplifying and clarifying legislation* versus
34:70 on adopting a greater lobbying role to *change or influence policy*.

Peter Ford, "APL Survey of Members", Pension Lawyer, No. 82, November 1999, pp. 20–21.

2003: Clear and workable

Our purpose in commenting is to help make the legislation clear and workable, rather than to criticise the policy.

And when it wasn't:

a parody of old-style legal drafting with *200 word sentences and multiple inconsistencies and ambiguities.*

Tim Cox, "Chairman's Column: eight (aka new Chairman's inaugural column)", Pension Lawyer, December 2003, pp. 1–2

2005: Unintended consequences and real schemes

There will always be unintended consequences.

You draw up legislation, looking back at something and trying to look forward. When you get to the future, the world in which the legislation was designed has changed and there will be unintended consequences.

what is often meant by a comment about 'unintended consequences' is that further thought should be given as to what might happen on the ground, in a real scheme, once legislation has been passed.

Harriet Maunsell OBE, "Pensions Regulation – Fact and Fantasy", APL Annual Lecture, 25 October 2005, reproduced in Pension Lawyer, Issue 105, June 2006, pp. 1–11.

2008: Policy versus implementation

"If the APL were advising lemmings, it would not comment on the advisability of jumping off cliffs, but direct them to the most efficient leaping point.

On the value of private discussions with DWP, which allow the APL to *inform DWP thinking at a much deeper level*.

Alastair Meeks, "Chairman's Column", Pension Lawyer, Issue 107, Summer 2008, pp. 1–2.

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Sources and further reading

Inside Government

- Suzannah Brecknell,"'It's a very creative job': Jessica de Mounteney on turning policy into law", *Civil Service World* (26 January 2026).
- Cabinet Office, *Guide to Making Legislation* (September 2025).
- Government Legal Service, *GLS Statutory Instrument Drafting Guidance* (March 2015).
- The National Archives, *Statutory Instrument Practice: A Guide to Help You Prepare and Publish Statutory Instruments and Understand the Parliamentary Procedures Relating to Them* (5th edn, November 2017).
- Office of the Parliamentary Counsel, *Common Legislative Solutions: A Guide to Tackling Recurring Policy Issues in Legislation* (March 2021, updated December 2025).
- Office of the Parliamentary Counsel, *Office of the Parliamentary Counsel Drafting Guidance* (4 April 2024).

Inside Parliament

- Meg Russell and Daniel Gover, *Legislation at Westminster: Parliamentary Actors and Influence in the Making of British Law* (Oxford University Press 2017).
- House of Lords Select Committee on the Constitution, *The Legislative Process: Preparing Legislation for Parliament*, Fourth Report of Session 2017–19, HL Paper 27 (25 October 2017).
- House of Lords Select Committee on the Constitution, *The Legislative Process: The Passage of Bills Through Parliament*, Twenty-Fourth Report of Session 2017–19, HL Paper 393 (8 July 2019).
- UK Parliament, Joint Committee on Statutory Instruments (committee webpage).

Inside the statute book

- Daniel Greenberg (ed), *Craies on Legislation: A Practitioner's Guide to the Nature, Process, Effect and Interpretation of Legislation* (13th edn, Sweet & Maxwell), updated by the First Supplement (2025).
- Daniel Greenberg, *Laying Down the Law: A Discussion of the People, Processes and Problems that Shape Acts of Parliament* (Sweet & Maxwell 2011).