Using the template in Europe or the United States

The template is written to UK practice. A change to how people work, where the work is done and who holds the data meets rules that differ outside the UK. This page lists what to check and who regulates it. Whether a rule applies to you, and how, is for your own advisers in that country.

Europe (European Union)	What to check	Who regulates it
Every section	Most of the rules below are EU directives. Each member state puts a directive into its own national law, so the detailed rule can differ from country to country.	Differs by member state
Organisation and people	Whether the rules on informing and consulting employees apply (Directive 2002/14/EC). They cover decisions that could lead to substantial changes in how work is organised. Member states choose whether they apply to companies with at least 50 employees or establishments with at least 20.	Set in national law. The authority differs by member state
Organisation and people, Transition roadmap	Whether planned job losses count as collective redundancies (Directive 98/59/EC), which bring consultation with workers' representatives in good time and written notification to a public authority. The directive gives member states a choice of two numerical tests.	The competent public authority in each member state receives the notification
Locations and sourcing	Whether moving work to another owner counts as a transfer of a business (Directive 2001/23/EC). On a transfer the general rule is that employees keep their rights and obligations under their existing contract. The directive has exceptions, such as insolvency.	Set in national law. The authority differs by member state
Governance	European Works Councils (Directive 2009/38/EC), for undertakings and groups with at least 1,000 employees in the EU and at least 150 in each of at least two member states. Amended by Directive (EU) 2025/2450: the new rules apply from 2 January 2029, with some provisions applying from 2 January 2028.	Set in national law. The authority differs by member state
Technology and data	Personal data (the GDPR, Regulation (EU) 2016/679). Whether the change sends personal data outside the EU and, if so, which of the regulation's transfer instruments applies. An adequacy decision and standard contractual clauses are two of them.	One or more supervisory authorities in each member state, listed by the European Data Protection Board
Locations and sourcing, for financial firms	Technology suppliers (DORA, Regulation (EU) 2022/2554, applying since 17 January 2025). Whether the firm is a financial entity in scope, and what the regulation asks on technology supplier risk and on the contracts for those services.	National competent authorities. The European Supervisory Authorities oversee suppliers designated as critical
Technology and data	Cybersecurity (NIS2, Directive (EU) 2022/2555). Whether the organisation is in scope. The directive applies mainly to medium-sized and large entities in listed critical sectors, and covers supply chain security. Member states had until 17 October 2024 to put it into national law.	Set in national law. The authority differs by member state

United States	What to check	Who regulates it
Organisation and people, Transition roadmap	Notice of closures and layoffs (the federal WARN Act). Whether the employer is covered, how employees are counted, whether the event meets the tests for a plant closing or mass layoff, and the notice period. The Department of Labor describes 60 calendar days' written notice from employers with 100 or more employees, with counting rules and exceptions.	The Department of Labor administers the Act. It has no role in seeking damages for workers
Organisation and people, Locations and sourcing	State notice laws. Some states have their own, each with its own conditions. California's refers to employers of 75 or more employees and 60 days' notice. New York's refers to private businesses with 50 or more full-time employees in the state and 90 days' notice.	Differs by state. In California the Labor Commissioner may enforce the notice requirements. In New York notice goes to the state Department of Labor
Organisation and people	A workforce represented by a union. The employer has a duty to bargain in good faith with the employees' representative. Whether the change itself is a subject of bargaining, or only its effects on those employees, depends on the kind of change.	The National Labor Relations Board
Organisation and people	Choosing who is laid off. Which federal anti-discrimination laws apply to the employer. They cover the selection of employees for layoff.	The Equal Employment Opportunity Commission
Technology and data	Privacy and data security. Which federal and state laws apply. The Federal Trade Commission enforces Section 5 of the FTC Act and other federal privacy and security laws. States have their own laws, such as the California Consumer Privacy Act.	The Federal Trade Commission. In California, the Attorney General and the California Privacy Protection Agency
Locations and sourcing, for banks	Outsourcing. The federal banking agencies issued joint guidance on managing risk in third-party relationships in June 2023. It gives the agencies' views on sound practice. The FDIC said in March 2026 that it is re-evaluating that guidance, so whether it is still current is a check.	The Federal Reserve Board, the FDIC and the OCC

Localisation checks for either region: spelling, job titles, date formats and currency, and the regulators named in the governance section.

Sources: the statements above were taken from official pages read on 2 October 2026. The pages are listed at policysight.com/templates/target-operating-model. Version 1.0, next review April 2027.

This guide is a starting point, not legal or regulatory advice, and PolicySight Ltd is not a law firm. It is a list of things to check. It is not complete and law changes. Have your own advisers confirm what applies to you before you rely on it.