

BEYOND THE SINGLE RULEBOOK

When Every Country Has Different Rules

A Practitioner's Perspective on Regulatory Complexity in Cross-Border Programmes



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1. The Promise of the Common Approach

There is a moment in every multi-jurisdictional programme where someone proposes the common approach. The logic is appealing: if we are implementing the same regulation across twelve countries, surely we can design a single solution and adapt it locally. This is the moment where the programme's assumptions are set — and, in my experience, it is the moment where most of the trouble begins.

The common approach promises efficiency, consistency, and control. What it delivers, more often than not, is a protracted negotiation between what the centre believes should be universal and what each jurisdiction knows to be non-negotiable. The programme spends its first phase designing the common solution and its remaining phases discovering why the common solution does not work.

2. Why the Complexity Is Not Where You Expect It

The obvious challenge in multi-jurisdictional delivery is regulatory divergence — the fact that different countries have different rules, different timelines, and different supervisory expectations. This is real, but it is also the complexity that programmes are prepared for. Teams build comparison matrices, map regulatory requirements across jurisdictions, and identify the gaps. This work is necessary. It is also insufficient.

The deeper complexity lies in three areas that are rarely addressed at programme inception:

- Organisational structure does not mirror regulatory structure. Most large organisations are structured by business line or function, not by jurisdiction. The regulatory requirement, however, is jurisdictional. This means that accountability for compliance sits in one structure while the capability to deliver it sits in another. Every multi-jurisdictional programme must navigate this misalignment, and most underestimate how much friction it generates.
- Local interpretation is not local resistance. When a country team pushes back on the common approach, the centre frequently interprets this as resistance to change. In my experience, it is more often a legitimate response to a real difference. The local team understands something about their regulatory environment that the central team does not, and the programme structure provides no good mechanism for that knowledge to flow upwards.
- Sequencing is a political act, not just a planning exercise. The order in which jurisdictions are brought into scope sends a signal about priority, and that signal has

consequences. Pilot countries carry the burden of proving the approach. Later countries inherit the constraints of decisions made without their input. No sequencing is neutral.

3. The Governance Problem

The governance of multi-jurisdictional programmes is, in practice, the governance of disagreement. The central programme team and the local teams will disagree — about scope, about timelines, about the degree of local adaptation that is acceptable. The question is not whether disagreement will arise but whether the governance model can resolve it without paralysis.

The pattern I have observed is this: programmes that vest decision-making authority entirely in the centre move quickly at first but accumulate implementation debt as local realities assert themselves. Programmes that distribute authority to the jurisdictions maintain local relevance but struggle to deliver anything consistent. Neither model works in isolation.

The programme that attempts to harmonise what regulators have deliberately kept separate will spend its life managing the gap between its own assumptions and the world as it actually is.

What works — to the extent that anything works cleanly in this space — is a governance model that distinguishes clearly between what must be common and what must be local, and that treats that boundary as a design decision rather than a default. The common elements should be genuinely common: the data model, the reporting taxonomy, the control framework. The local elements should be genuinely local: the process design, the supervisory relationship, the implementation sequence. The boundary between them should be explicit, documented, and governed.

4. The Resource Illusion

Multi-jurisdictional programmes routinely underestimate resource requirements, but the pattern of underestimation is specific. Central teams are typically sized for design and coordination. Local teams are typically sized for implementation. What is missing is the capacity for translation — the work of converting a central design into something that functions in a specific regulatory, operational, and cultural context.

This translation work is invisible in most programme plans. It does not appear as a workstream or a deliverable. It happens informally, in the gaps between what the centre specifies and what the local team builds. When it is done well, the programme succeeds without quite understanding why. When it is done badly — or not done at all — the programme discovers, at testing or go-live, that the common solution does not actually work in the jurisdictions it was designed for.

5. What Multi-Jurisdictional Delivery Actually Requires

The honest assessment, drawn from programmes that have navigated this terrain with varying degrees of success, is that multi-jurisdictional delivery requires a fundamentally different programme mindset. It requires acceptance that the common approach will be smaller than the centre wants it to be, and that local adaptation will be larger. It requires governance that treats jurisdictional disagreement as information rather than obstruction. It requires resourcing for translation, not just design and implementation.

Most importantly, it requires the programme to take the regulatory differences seriously – not as obstacles to the plan, but as the defining constraints within which the plan must operate. The regulations are different because the jurisdictions are different: different legal traditions, different supervisory philosophies, different market structures. A programme that treats these differences as friction to be overcome rather than reality to be accommodated will find itself in a permanent state of rework.

The organisations that deliver multi-jurisdictional programmes effectively are not the ones that find a way to make the differences disappear. They are the ones that build programme structures capable of holding the differences without collapsing under their weight.