

This master's dissertation deals with notice of termination of employment in three countries, specifically Czech Republic, Federal Republic of Germany and Great Britain, specifically England. The Federal Republic of Germany has been selected because Germany is a country with highly developed economy, however the social function of which is very fundamental that is also reflected in the notice of termination of employment legal regulation. Great Britain was selected because it represents different legal system to Czech republic or Germany, so called common law. British legal system can be further divided into legal systems of England and Wales, Northern Ireland and Scotland. This master's essay deals with the enactment in England. At the same time, it is also one of the economically most developed country in the framework of the European Union and a country in which a great number of Czech citizens seek their work opportunities. As far as structure of the individual Chapters is concerned, they are not arranged herein in the same scheme, because the legal form of the notice in the legal regulations differs so much, as far as conception or legal sources is concerned, that even the breakdown of the individual Chapters respects reflects such differences. Hence, the Chapter describing the notice in the Republic deals mainly the description of the notice such as regulated in the Labour Code, the Chapter describing the notice in the labour legislation in England deals with the differentiation of that how the notice is regulated by the common law and legal regulation, and in the Chapter dedicated to the notice form in Germany, the main distribution is based on which law regulates the notice feature because the labour legislation is not codified therein. In the last Chapter the master's dissertation tries to compare the legal regulation in England and Federal Republic of Germany with that of the Czech Republic. First of all in it tries to ascertain whether an inspiration for the notice arrangement in the Czech legal system could be found in these legal systems. It is an inspiration that would bring an increased element of flexibility but still without neglecting the protection of the employee. Thus, the question is the flexibility point of view. The specific inspiration seeks the possibility to adjust conditions of a notice according to how many employees the employer employs or to adjust the period of notice based on how long the employer gave work to an employee. The dissertation deals also in detail with a legal institute, which occurs in German labour law, more specifically with a constructive notice institute, and tries to assess whether it would be possible to implement such institute in the Czech legal order too.