

NEW COMPULSORY TRAINING ON HEALTH AND SAFETY AT WORK

On 24 May 2025, the State-Regions Agreement of 17 April 2025 entered into force upon publication in the Official Gazette. The Agreement harmonises and updates the contents of previous agreements relating to training in relation to health and safety at work matters; accordingly, the result is a fulsome, detailed text. The requirements for training courses, their duration and scope set out in the Agreement are to be deemed the minimum requirements, and each corporate employer needs to supplement these minimum requirements and **supplement them in accordance to its actual, specific needs**.

Furthermore, the training obligation required for employers necessitates verifying **who in the company holds this role** and, therefore, must be trained (whether all the members of the board of directors or whether only one or more identified persons, depending on the extent of the functions exercised and the organizational, managerial and spending powers assigned).

Key takeaways

- New compulsory training for employers
- Reformulation of training courses for supervisors
- Requirements for trainers and teachers
- Obligation to keep documents of completed courses in a "course file"
- Compulsory final assessment for all training courses and updates
- Subsequent evaluation of the effectiveness of training during the work activity
- Monitoring and control system shared between training institutions and recipients, to ensure the training is consistent with the specific risks of work duties

1. BASIC PRINCIPLES UNDER THE AGREEMENT

Companies are required to **expand and supplement** the minimum contents of the Agreement (i) to comply with any agreements or procedures that are more favourable to workers and (ii) to respond more effectively to the training needs identified in practice within their organisational structure.

Therefore, the results of the Risk Assessment Document and the ensuing technological or organisational changes assume central importance, as do, the specific risks arising from duties and changes thereof, as well as the process to evaluate the effectiveness of training during the work activity. The need for further training may be identified immediately after and in the context of an assessment of the foregoing elements, and therefore in advance of the deadlines for a re-valuation of the training imposed by the Agreement.

Indeed, one of the most important innovations arising from the Agreement, is the introduction of the process to assess the training's effectiveness, which must be carried out as the work activity is performed, as well as the final assessment at the end of each initial or refresher training course. This

approach aims to ensure that training becomes a true prevention tool, capable of adapting to regulatory and technological developments in the work context, rather than a mere formality.

2. MAIN CONTENTS OF THE AGREEMENT

The Agreement sets out and provides for:

- the **duration, minimum contents and methods of training** and subsequent **mandatory refresher training** for the persons in safety management roles;
- the methods to be used to **verify how much has been learned** at the end of the course;
- how to manage **final testing reports**, which must be drawn up by the trainer and contain certain minimum elements;
- that **certificates** must be issued to all those who have regularly participated in the course and have passed the final exam;
- subsequent **checks on the effectiveness** of training during the performance of the work activity;
- the use of a system to **monitor the application of the agreements** and of the training, aimed at ensuring compliance with current legislation;
- the use of accredited **instructors**, institutional instructors and other instructors suitably authorised to hold the courses;
- the minimum requirements that instructors must meet;
- the **course method**, based on a pre-defined training project, which in some cases determines the maximum number of participants;
- an obligation for the instructor to procure safekeeping of a paper or electronic archive of the **"course file" documentation**, which must be kept for at least 10 years and must have a minimum pre-defined content, including details on the training project, the attendance register, test reports and the related certificates.

3. TRAINING OF EMPLOYERS, MANAGERS AND SUPERVISORS

One of the most significant innovations under the Agreement is the mandatory training for employers and the newly-revised training courses for supervisors, in accordance with the regulatory changes introduced by Law No. 215 in 2021.

Employer training

The new Agreement introduces a structured training course for employers, consisting of a 16-hour basic course covering both regulatory and management matters.

In addition, contractors involved with temporary and mobile construction sites are required to attend an additional 6-hour module focusing specifically on the characteristics of the construction site environment.

A refresher course is mandatory every five years and must have a minimum duration of 6 hours. The course can be delivered in person, in live videoconference or in e-learning mode (on demand), thus offering great organisational flexibility.

Employers are required to complete the training **by 24 May 2027**.

Manager training

The training course for managers has a duration of 12 hours. An additional 6-hour "construction sites" module is planned for managers of contractors involved with temporary and mobile construction sites.

Supervisor training

The course for supervisors must last a minimum of 12 hours, and cover legal, management and organisational matters as well as the evaluation, monitoring and communication relating to risk situations. The course can only be taught and attended in person or by live videoconference, **and therefore cannot be object of e-learning on-demand.**

The goal is to provide supervisors with the necessary skills to supervise, act, communicate effectively and cooperate with employers and managers involved in safety management. The contents of the course include legal and organisational aspects, risk assessment, emergency management and communication with workers.

4. COURSE FOR RSPPs and ASPPs

The Agreement confirms and strengthens the training required for the Prevention and Protection Service Managers (RSPP). The training course remains divided into three modules:

- Module A (28 hours): basic course for both RSPP and ASPPs, which is preparatory to the other modules;
- Module B (48 hours): dedicated to the specific risks of the production sectors, with possible specialisation modules for high-risk sectors;
- Module C (24 hours): compulsory only for RSPPs, focused on relational, managerial and organisational skills.

The Agreement also clarifies the level of education/degrees that will entitle to an exemption from one or more of the above modules.

Refresher courses remain compulsory every five years, with a minimum number of hours of:

- 40 hours for RSPPs;
- 20 hours for ASPPs;

Refresher courses can be distributed over the five-year period and must reflect regulatory, technical and organisational developments, as well as the results of the assessments on the effectiveness of the training attended.

Training for employers who are also RSPPs

Should the employer also wish to assume the role of RSPP, attendance at the newly introduced course for employers is required, followed by an additional 8-hour general module valid across all sectors, as well as further modules specific to certain sectors.

For the basic training, the on-demand e-learning delivery mode is not available.

The refresher course will have a duration of 8 hours and must be completed every 5 years for all risk classes and can be attended in person, by videoconference or in e-learning on demand mode.

Training for RSPPs and ASPPs

The training for RSPPs and ASPPs remains divided among three modules: Modules A and B, common to both roles, and Module C, mandatory only for RSPPs. Refresher course are every five years: 40 hours for RSPPs and 20 hours for ASPPs, to be completed within the five years following the completion of the common Module B.

5. WORKER TRAINING

The Agreement confirms that every training course must start from the analysis set out in the Risk Assessment Document, which becomes the reference point to define the contents, duration and methods of training.

The Agreement reiterates that training must take place on the occasions specified in letters a), b) and c) of paragraph 4 of art. 37 of Legislative Decree No. 81/2008, namely:

- a) upon the establishment of the employment relationship (or the start of the assignment in the case of temporary agency work);
- b) upon transfer or change of duties;
- c) upon the introduction of new work equipment or new technologies, or new hazardous substances and mixtures.

For newly hired personnel, the training course must be completed before the start of work activities: the Agreement no longer includes the possibility of postponing part of the training within 60 days after hiring, as was allowed under the previous State-Regions Agreement of 21 December 2011.

Training for workers is divided into two modules: a 4-hour general module, followed by a specific company module, the duration of which varies depending on the level of company risk (4, 8 or 12 hours). The contents of the courses must be closely linked to the actual risks of the work duties and sector, and courses therefore must be organised for homogeneous groups of workers.

The general module must cover the fundamental concepts of prevention and safety. Specific training, on the other hand, will delve into the actual risks associated with the specific work tasks and must be updated every five years.

Even self-employed workers, pursuant to art. 21 of Legislative Decree No. 81/2008, can make use of these training courses, to the extent consistent with their activities.

Special conditions apply, according to which workers who do not access the production departments can follow the courses provided for low risk.

The Agreement recognises as valid the training courses provided by accredited bodies, provided that they comply in content and duration, and confirms the full equivalence of the "16 hours-MICS" courses for the construction sector.

Employers who also hold the role of RSPP, provided they meet the formal qualifications required for instructors, can themselves carry out the training for their workers, supervisors and managers, for certain, specific content.

Before courses start, the employer must send a request for cooperation to the territorially and sectorally competent joint bodies. If the employer does not receive a response within 15 days, it can proceed independently, taking into account any indications received.

6. TRAINING FOR THOSE WHO WORK WITH SPECIAL EQUIPMENT

The Agreement confirms the general structure of courses for the use of equipment that requires certification for use, but introduces the obligation of theoretical-practical training also for some equipment that had not been specifically regulated. These include overhead cranes (4 hours of classroom learning + 6-7 hours of practical training), as well as material handling loaders (CMMs)

and loaders of agricultural fruit harvesting machines – CRF (in each case, 4 classroom learning + 4 hours of practical training). All courses must be taught and attended in person.

Training must be completed by **24 May 2026**.

As refresher every five years, a 4-hour refresher course focused on practical training must be completed.

7. TRAINING FOR SITE COORDINATORS (CSP/CSE)

The Agreement does not introduce substantial changes to the training for Safety Coordinators in the Design Phase (CSP) and in the Execution Phase (CSE), who are key roles in the context of temporary and mobile construction sites.

The training course, as before, is divided into a basic course lasting 120 hours, which covers legal, technical, organisational and practical aspects. The obligation of refresher courses every five years is also confirmed, with a minimum commitment of 40 hours, necessary to maintain the validity of the qualification and to be able to continue to carry out the role.

8. TRAINING FOR WORKERS IN CONFINED SPACES OR POTENTIALLY POLLUTED ENVIRONMENTS

The Agreement introduces important innovations for the training of those working in confined spaces or areas where pollution is suspected. The course has a minimum duration of 12 hours and is divided into classroom learning/theory, focused on the reference legislation, and practical training, essential to acquire operational skills. Training is in-person only, to ensure safer and more effective learning.

A refresher course, with a minimum duration of 4 hours, is scheduled every five years and must be taught and attended in-person.

A central element concerns instructors, who are required to have documented, professional experience of at least three years in the field.

9. REFRESHER COURSES

The Agreement introduces a structured system of periodic updates for all those involved in occupational health and safety. The required frequency of the updates varies according to the role: for employers, managers and workers, the five-yearly frequency is confirmed, with a minimum duration of 6 hours; for supervisors, the refresher course is to be held every two years, again with a minimum duration of 6 hours.

10. SUMMARY TABLE

Course Name	Modality	Training course hours	Refresher course hours	Minimum refresher frequency
Employers – Construction site module for employers in sector	in person video conference on demand e-learning	16 6	-	-
RSPP Employers – Supplementary module by sectors	in person video conference	8 (12/16)	-	-
RSPP/ASPP	in person video conference on demand e-learning	28 (mod. A) 48 (mod. B) 24 (mod. C)	40 (RSPP) 20 (ASPP)	5 years
Executives	in person video conference on demand e-learning	12	6	5 years
Supervisors	in person video conference	12	6	2 years
General training for workers	in person video conference on demand e-learning	4	-	-
Specific training for workers - <i>High risk</i>	in person video conference on demand e-learning (update only)	12	6	5 years
Specific training for workers - <i>Medium risk</i>	in person video conference on demand e-learning (update only)	8	6	5 years
Specific training for workers - <i>Low risk</i>	in person video conference on demand e-learning	4	6	5 years
Workers using special work equipment	in person video conference (classroom learning part only, not for refresher course)	Varies with respect to equipment	4 (1 classroom + 3 practical)	5 years
Construction site safety coordinators	in presence video conference on demand e-learning (refresher course only)	120	40	5 years
Confined spaces and suspected pollution	in person video conference (classroom part only, not for refresher)	12	4	5 years

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