

Comparison of International Recognition Procedures for the Qualification of Prevention Technician: An Analysis between the European Union and Non-EU Countries

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ABSTRACT

The recognition of the title of "Prevention Technician" abroad is a crucial issue for professional mobility, especially in an increasingly interconnected global context. In Italy, this role plays a fundamental part in health prevention and management, but the recognition of this title in other countries, both within the European Union (EU) and outside the EU, presents significant challenges. The aim of this article is to compare the procedures for recognizing the title of Prevention Technician in several European and non-European countries, highlighting common issues, differences in regulatory pathways, and best practices that could be adopted to facilitate international mobility. The research was conducted through a regulatory analysis of EU legislations and those of some non-EU countries, with a comparative study of recognition procedures in Germany, the United Kingdom, the United States, and Canada. The results show that, while the EU has more standardized procedures, non-EU countries require individual assessments, with highly variable costs, timelines, and requirements. The main barriers identified are the lack of uniformity in regulations, high costs, and the need for additional evidence. The implications of these results are crucial for improving the effectiveness of recognition and facilitating the mobility of professionals, suggesting both regulatory and practical interventions by the relevant authorities.

INTRODUCTION

The Prevention Technician is a professional figure within the Italian National Health Service. Specifically, in Italy, the path to becoming a Prevention Technician involves a three-year university degree in Prevention Techniques in the Environment and Workplaces, followed by professional accreditation obtained through the successful completion of a State Exam, as established by Ministerial Decree (DM) 58 of 1997.

This decree defines the profile of the Prevention Technician, outlining that this role is responsible for all activities related to prevention, verification, and control in areas of environmental hygiene and safety in living and working spaces, food and beverage hygiene, as well as public health and veterinary hygiene.

Furthermore, the Prevention Technician, with inspection and supervision duties, is, within the scope of their responsibilities, an officer of judicial police and carries out investigative activities aimed at issuing authorizations or technical-health permits for activities subject to control.

With the rise of international mobility, it has become increasingly important to ensure that the title of Prevention Technician is recognized globally, enabling professionals to practice their work in other countries. However, despite the European Union promoting the free movement of workers, the recognition of the Prevention Technician title abroad remains complex and often discouraging. The reasons for this difficulty mainly stem from a

lack of uniformity between different countries, both in terms of education and professional regulation. Additionally, the limited availability of information and the absence of standardized recognition pathways can present significant obstacles for those wishing to pursue professional experiences outside Italy.

This paper aims to compare the procedures for recognizing the title of Prevention Technician in several EU and non-EU countries to highlight common issues, regulatory barriers faced by professionals, and best practices adopted in certain countries. The goal is to provide a clear overview of the opportunities and challenges related to the international recognition of the title, with the intention of improving professional mobility and facilitating access to the global job market for Prevention Technicians.

MATERIALS AND METHODS

This study is based on a qualitative-descriptive comparative analysis aimed at exploring the procedures for recognizing the title of Prevention Technician in the Environment and Workplaces (TPALL) in a selection of European Union (EU) countries and non-EU countries.

The methodological objective is to compare the main requirements, timelines, costs, and access modalities for professional recognition, highlighting the similarities, challenges, and opportunities for Italian professionals seeking to practice abroad.

Six countries were selected based on:



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- Geopolitical relevance;
- Different regulatory status compared to Italy (EU vs. non-EU);
- Accessibility of public information.

The countries included in the analysis are:

- EU: Germany, France, Spain;
- Non-EU: United Kingdom (post-Brexit), United States, Canada.

Information was gathered through:

- Consultation of official sources (ministries, health profession regulatory bodies, embassies);
- Analysis of title recognition platforms (e.g., ENIC-NARIC, HCPC, ZAB, NASBA, WES Canada);
- Research of current regulations at the European level (Directive 2005/36/EC) and national level.

For each country analyzed, the following elements were considered:

- Type of recognition (automatic, partial, discretionary);
- Documentary requirements (translations, certifications, supplementary exams);
- Responsible reference bodies overseeing the process.

RESULTS

According to EU regulations ensuring the free movement of workers, the EU member states have established specific procedures for the recognition of academic qualifications abroad. This recognition can serve academic purposes, such as continuing studies, or professional purposes, such as working in a regulated profession. In both cases, graduates can request the equivalence or recognition of their qualifications in another European country, although the procedures vary from state to state.

In France, for example, to practice as a Prevention Technician, which is a regulated profession (i.e., a profession whose access or practice is legally tied to specific professional qualifications recognized by the state, meaning you cannot legally work in that profession without a license, certification, or registration with a competent authority), it is necessary to obtain a recognition certificate for the academic qualification from the ENIC-NARIC Center. Once this recognition is obtained, it must be verified whether the profession requires registration with a professional body, such as the ARS. The recognition process involves submitting official documents translated by a certified translator, which is the only mandatory bureaucratic cost, along with postal expenses. Although a formal language certificate is not required, it is essential to understand and speak French fluently. For language competency verification, there are two options: taking a written and oral test in French or completing an equivalency internship. At the end of the chosen path, the DRJSCS (Direction régionale de la jeunesse, des sports et de la cohésion sociale)

will assess the candidate's eligibility to practice the profession, possibly requiring an additional period of supplementary internship.

In Germany, a recognition procedure is also required to legally work as a Prevention Technician. Competence is delegated to individual Länder (there are 16 of them, which are the federal states of Germany), each of which has autonomy in matters of education and professional qualifications. The responsible body for recognition is typically the LaGeSo (Landesamt für Gesundheit und Soziales), while for academic equivalency evaluation, reference is made to the ZAB (Central Office for Foreign Education), whose official database is available on the Anabin website.

It is important to distinguish between regulated professions, where recognition is mandatory, and non-regulated professions, where one can work even without formal qualification equivalency. In the latter case, however, it is still advisable to request a "Zeugnisbewertung," which is an official academic qualification evaluation issued by the ZAB, confirming the comparable German qualification and potential professional opportunities in Germany. This evaluation costs approximately 100 euros. Additionally, for access to health or technical professions, possession of a B2-level certificate of German language proficiency is often required.

In Spain, the recognition of the Italian Prevention Technician qualification can follow three different paths, depending on the purpose: "Equivalencia," which is only for academic purposes; "Reconocimiento profesional," useful for working in regulated professions; and "Homologación," a more complex and lengthy procedure that recognizes both academic qualifications and professional accreditation. The Prevention Technician profession is among those regulated.

However, those wishing to work exclusively and immediately in the field, without academic interests, can pursue the "Reconocimiento profesional" route. The competent authorities for these recognitions are the Spanish ministries specific to the sector. For "Homologación," it is mandatory to prove language proficiency from the outset, while for professional recognition, it may be required later by the professional association. In Spain, the main costs involve sworn translations and any required certifications.

Among regulated professions, for which the recognition of the qualification is mandatory, are those involved in public health protection or inspection functions, such as the Environmental Health Officer, the Tecnico della Prevenzione, nurses, doctors, or physiotherapists, all of whom are legally required to register with a professional body or competent authority. Conversely, non-regulated professions include consulting or training activities — for example, safety consultants or Health & Safety Advisors — who do not exercise public



control powers: in these cases, formal recognition of the qualification is not mandatory, although it is recommended to enhance one’s professional profile in the private sector.

For all EU countries, the necessary documentation may vary, but generally includes sworn official translations, any supplementary certificates, and a declaration of good professional standing (the so-called "Good Standing"), issued by the Italian Ministry of Health.

In the United Kingdom, before Brexit, title recognition was automatic under Directive 2005/36/EC. Today, with the UK outside the EU, recognition is no longer guaranteed and depends on the specific profession. For regulated professions, it is necessary to contact the competent body, such as the HCPC (Health and Care Professions Council), which assesses whether the foreign qualification is comparable to the UK qualification. However, in the case of the Prevention Technician, there is no exact equivalent. The most similar professions are: Health and Safety Officer, Environmental Health Officer (EHO), and Occupational Health and Safety Specialist. If you wish to work as an Environmental Health Officer, recognition must be obtained from the CIEH (Chartered Institute of Environmental Health), which may require supplementary courses. For roles in the private sector, such as Health and Safety Advisor, no registration with any body is required. In any case, it is useful to obtain a Statement of Comparability from the UK ENIC, certifying the academic equivalence of the qualification. If you intend to become an inspector for the HSE (Health and Safety Executive), a UK government body, you can apply for trainee inspector positions. In this case, you will receive internal training for four years. To access the program, a three-year degree (Bachelor's degree) with at least a 2:1 grade is required, along with a good level of English (e.g., IELTS ≥ 7.0). Additionally, to work legally in the UK, a Skilled Worker Visa and an accredited sponsor from the UK Home Office are required. After Brexit, if an employer intends to hire foreigners permanently, they must be expressly authorized by the Home Office. This authorization is known as the "Sponsorship License" (SPL). Employers with an SPL qualify as "sponsors." In Canada, access to the workforce requires a work permit, which is typically granted to those who

already have a contract with a Canadian employer. As in other cases, the first step is the recognition of the academic qualification, which must be obtained through an academic credential assessment (ECA) via agencies such as WES.

Once the equivalency with a Canadian Bachelor’s degree is certified, it is necessary to check whether, in the province where one intends to work (Ontario, Québec, British Columbia, etc.), additional licenses or certifications are required. The comparable professions in Canada are two: Health and Safety Officer and Environmental Health Officer. The latter requires professional certification CPHI(C).

Regulations in this regard vary from province to province, so procedures and requirements can differ significantly.

In the United States, there is also no automatic recognition system. Most healthcare and technical professions are regulated at the state level, so one must apply for a license with the competent state authority. To have the Italian qualification assessed, it is necessary to contact a recognized credential agency in the USA. In some cases, a "Dichiarazione di Valore" (Declaration of Value), a document issued by the Italian consulate certifying the legal value of the title, may also be required.

As in Canada, the professions most similar to the role of the Italian TPALL are the Occupational Health and Safety Specialist and the Environmental Health Officer. In conclusion, if one intends to practice a regulated profession in an EU country, they must apply for title recognition. The fundamental principles that govern this procedure are:

- Mutual trust between member states, preventing arbitrary rejection of another country’s title;
- The recognition principle, according to which those qualified in their home country do not need to requalify abroad;
- Potential supplementary training, in the case of substantial differences in educational paths, in the form of internships or aptitude tests.

Finally, to navigate the regulations and procedures of each country, it is always advisable to consult the national information centers recognized by the ENIC-NARIC network, available at: www.enic-naric.net.

Below is a brief handbook that summarizes what has been explained above.

Country	Corresponding Profession	Registration with professional body/authority required?	Notes
France	Technicien de la Prévention	Yes, if the profession is regulated, registration with the ARS (Agence Régionale de Santé) is required after ENIC-NARIC recognition	Language proficiency can be verified through a test or an equivalence internship
Germany	Fachkraft im Gesundheitsschutz or similar	Yes, for regulated health professions, registration with the regional professional body (Land) is mandatory	B2 level of German language proficiency is required



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Spain	Técnico en Prevención or equivalent	Yes, for regulated professions registration with the professional association is required	Language skills may be requested before or after, depending on the chosen procedure
United Kingdom	Environmental Health Officer (EHO)	Yes, with the CIEH (Chartered Institute of Environmental Health) for regulated public roles	Alternatively, for private roles such as Health & Safety Advisor, no mandatory registration is required
Canada	Environmental Health Officer	Yes, EHO requires CPHI(C) certification	For Health & Safety Officer (private role) no registration is required, only a work permit
USA	Occupational Health and Safety Specialist / Environmental Health Officer	Yes, in many states a license from the competent state authority is required	Regulation is on a state basis, so it must be checked case by case

DISCUSSION

The comparative analysis of the recognition procedures for the Prevention Technician title in EU and non-EU countries has highlighted a highly heterogeneous landscape, characterized by significant differences both in the required qualifications and the methods of accessing the profession. This reflects not only the diversity of regulatory and educational systems but also the lack of an internationally shared framework for the regulation of health and technical professions.

Within the European Union, Directive 2005/36/EC represents an important tool for regulatory harmonization, facilitating professional mobility through principles such as mutual recognition and the possibility of compensatory measures in cases of substantial differences in educational pathways. However, despite this common framework, the operational procedures and language, documentation, and educational requirements vary significantly between member states. For example, while in France the process is centralized and includes a language test or an adaptation period, in Germany, recognition is entrusted to individual Länder, each with its own specific criteria and costs. Spain, on the other hand, clearly distinguishes between academic and professional pathways, introducing greater flexibility for candidates interested solely in the job market.

In non-EU countries, the framework is even more fragmented and lacks binding supranational tools. In Canada and the United States, for instance, the recognition of the title is assigned to private evaluators and professional bodies in individual provinces or states. This results in complex procedures with unpredictable and often costly outcomes, both economically and temporally. The case of the United Kingdom, post-Brexit, is emblematic: with the European Directive no longer applying, recognition now occurs on a discretionary

basis, with criteria often misaligned with the Italian pathway. Additionally, none of the countries analyzed have a professional figure that perfectly matches the Italian Prevention Technician, making it necessary to identify similar roles (such as Environmental Health Officer or Occupational Health and Safety Specialist), which, although related in terms of skills, can differ substantially in legal, operational, and educational contexts.

Another critical element concerns the very concept of regulated profession, the meaning of which varies across jurisdictions. In Italy, the TPALL is a legally defined figure with inspection duties and judicial police functions; in other contexts, prevention and safety activities are carried out by several distinct figures or do not require formal qualification. This misalignment creates uncertainty in recognition and generates difficulties in identifying the competent authority or the most appropriate pathway for professional integration abroad.

Equally relevant is the lack of transparency and the difficulty in accessing up-to-date information on recognition procedures, especially in non-EU contexts. Even when official guidelines are available, they are often fragmented, unclear, or subject to frequent changes. In this context, the role of international information networks (ENIC-NARIC, WES, UK ENIC) is crucial but should be further strengthened, both in terms of support and institutional cooperation between countries.

In light of these considerations, the need for the following appears evident:

- Greater harmonization of professional qualifications at the international level;
- Development of clearer tools for comparing educational pathways;
- Strengthening cooperation between professional bodies and credential evaluation agencies;
- Creation of a national observatory on healthcare professional mobility, capable of collecting



data and proposing evidence-based regulatory solutions.

Finally, it is essential to recognize that international mobility for prevention professionals represents not only an individual opportunity but also a benefit for healthcare systems as a whole, through the spread of best practices, intercultural competencies, and technical innovations. In this regard, removing barriers to the recognition of the Prevention Technician title is a necessary step to foster a more integrated, safe, and efficient global healthcare system.

CONCLUSIONS

The international recognition of the title of Prevention Technician is a complex and uneven process, significantly influenced by local regulations, the presence or absence of equivalent professional figures, and the classification of the profession as regulated. Within the European Union, thanks to Directive 2005/36/EC, there is a more cohesive regulatory framework and principles like mutual recognition that promote professional mobility. However, even within Europe, procedural discrepancies, language differences, and additional requirements remain, which can pose barriers to practicing the profession.

Outside the European Union, the situation becomes even more complicated. Non-EU countries adopt

autonomous criteria, often lacking a direct reference to the figure of the Prevention Technician, and require customized assessments of qualifications, with variable outcomes and often long processing times. The most common difficulties include the lack of correspondence between professional profiles, the need to undergo additional training courses or exams, high costs for credential recognition, and obtaining work permits.

Despite these challenges, some positive experiences also emerge. The use of official platforms such as ENIC-NARIC, Anabin, or WES, the presence of professional reference bodies, and the possibility of obtaining formally recognized academic and professional evaluations are useful tools for navigating recognition procedures.

To improve the international mobility of Prevention Technicians, it is necessary to promote specific bilateral agreements, strengthen cooperation between educational institutions and regulatory bodies, and raise awareness among national authorities about the strategic importance of this figure in the healthcare, environmental, and occupational fields. Only through more transparent, consistent, and accessible recognition can the competencies of Italian professionals be fully valued, facilitating their integration into international labor markets and contributing to the wider spread of a prevention culture globally.

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