

HQ Education policy

(Education Committee – January 2024)

Education First

Education is one of Holland Quaestor's primary concerns which is why education is one of the most important means for our members to permanently contribute to the integrity of our financial system. For this reason, Holland Quaestor members are required to undergo continuing Professional Education each year. Holland Quaestor offers an education programme each year to all MDs (statutory directors), proxy holders and compliance officers and also all client-facing staff working for its members at a variety of levels.

Holland Quaestor not only contributes to the education offered but also tests members' compliance with this HQ education requirement.

We introduced a Learning Management System in early 2022 to improve the efficiency of the entire process, from individual enrolment to evaluations of each session, and to safeguard the quality review more fully .

[HQacademy | Catalogue](#)

Vision

All employees at a trust office need to undergo continuing Professional Education (PE) to ensure that the office meets the quality expectations our stakeholders have of them as financial service providers and gatekeepers.

Groups of employees covered by the PE requirement:

1. Client handlers

Client handlers are staff members who are actively and substantively involved (with actions) on the client file, such as:

- relationship management;
 - legal;
 - financial and fiscal
- and who therefore perform a gatekeeper role.

The following roles, activities and employees are not included:

- receptionist (reception of clients in person or via the telephone);
- archive work;
- outsourcing of accounting tasks abroad (outsourcing centres), provided that final responsibility is in the Netherlands;
- self-employed persons temporarily (maximum 12 months) contracted by the office.

2. Proxy holders

Employees employed by Holland Quaestor with power of attorney.

3. Certified Compliance officers

Certified compliance officers are subject to the same continuing Professional Education requirement as proxy holders.

Compliance staff are subject to the same continuing Professional Education requirement as client handlers. Each trust office is required to employ a certified compliance officer who is registered in the DSI register. For further details, see the 'Compliance Officer 2023' Guidelines (Publications | HollandQuaestor)

4. Managing Directors (MDs)

Policymakers who are registered as statutory directors.

5. MT members

Management Team Members (different composition in each office), who are not MDs or proxy holders.

Professional Education (PE)

The PE requirement for the following groups of employees:

- Client handlers: 10 PE points where all 10 PE can be obtained from non-accredited subjects.
- Proxy Holders: 20 PE points per year, including 10 HQ-accredited PE points and 10 PE in non-accredited subjects.
- Compliance officers¹: 20 PE points per year, of which 10 HQ-accredited PE points and 10 PE in non-accredited subjects (Compliance Officer | HollandQuaestor)
- MDs: 20 PE points per year, including 10 HQ-accredited PE points and 10 PE in non-accredited subjects. MDs must attend at least 1 Tone at the Top-MD session each year supplemented by a second Tone at the Top-MD session or 1 Tone at the Top session, and the points gained this way fall within the 20 PE obligation (NB: an MD session attracts a minimum of 5 HQ-accredited PE points, and a Tone at the Top session attracts a minimum of 3 HQ-accredited PE points).
- MT members: 10 PE points per year, where 1 PE point is obtained from 1 HQ Tone at the Top session and the remaining PE points can be obtained according to preference.

Quality of service provision by well-qualified staff

To ensure quality for clients, Holland Quaestor imposes a minimum annual development and/or training requirement on all employees of its members who are subject to this requirement. These are all employees directly involved in activities related to the Trust Offices (Supervision) Act 2018.

The trust office can demonstrate that it meets this requirement by signing the annual Self Declaration or by providing Holland Quaestor with access to the accredited training policy it has adopted, including an overview of the mandatory content to be followed by the various groups of employees.

Classification of training levels

Holland Quaestor recognises the following levels of training:

- basic;
- advanced;
- proxy holder and
- MD (statutory director).

¹ Compliance officers: see Compliance Officer January 2023 Guidelines (Publications | HollandQuaestor)

Training opportunities/requirements at different levels

Basic

All employees starting at a trust office, whether they are a school leaver or lateral entrant, take the **Basic Trust Officer 1 Programme (BOTO 1)** within 2 years.

BOTO 1 requires a minimum of 28 course hours = 28 PE points. See appendix for requirements. The BOTO 1 can be taken internally or externally.

Advanced

Trust offices can offer advanced employees (including lateral entrants) the **Basic Trust Officer 2 Programme (BOTO 2)**. BOTO 2 requires a minimum of 32 course hours = 32 PE points². The BOTO 2, which is not mandatory, can be taken internally or externally.

Proxy holders

Proxy Holders are required to successfully complete the **Master Certified Trust Officer Programme (MOCTO)** within 2 years of appointment. The MOCTO requires a minimum of 80 course hours = 80 PE. The MOCTO is only offered externally.

Managing Director (MD/statutory directors)

MDs are under the same requirement as Proxy Holders to complete the MOCTO.

MD/statutory directors have an additional obligation to attend 1 Tone at the Top-MD session each year and, if they wish, a second Tone at the Top-MD session or Tone at the Top session.

Annex: PE regulations 2024

² The HQ Learning Outcomes are the guiding principles for the Basic, Advanced and Proxy Holder when taking the BOTO 1, BOTO 2 and MOCTO. (See Learning [Outcomes for Trust Officer training programmes](#))

PE REGULATIONS 2024

	PE-points		MD-session and/or Tone at the Top-session ³
	Geaccrediteerd	Niet HQ geaccrediteerd Vrije ruimte ²	
Managing Directors	10	10	2
Proxyholders	10	10	-
Compliance Officers ¹	10	10	-
Cliëntbehandelaars, medewerkers compliance	-	10	
MT-leden	10		1 ⁴

¹ For further details, see the Compliance Officer January 2023 guidelines (HQ website/publications)

² Non-accredited subjects include training courses in the employee's specialist field and softs skills

³ Each MD session is worth a minimum of 5 accredited points, and each Tone at the Top session is worth a minimum of 2 accredited points.

⁴ MT members are required to attend one Tone at the Top session per year

1. PE obligation

1.1 Members of Holland Quaestor are required to undergo PE each year. From 1 January 2024, the following requirement will apply annually:

- Client handlers: 10 PE points where all 10 PE can be obtained from non-accredited subjects.
- Proxy Holders: 20 PE points per year, including 10 HQ-accredited PE points and 10 PE in non-accredited subjects.
- Compliance offices¹: 20 PE points per year, including 10 HQ-accredited PE points and 10 PE in non-accredited subjects ([Compliance-Officer | Holland Quaestor](#)).
- MDs: 20 PE points per year, including 10 HQ-accredited PE points and 10 PE in non-accredited subjects. MDs must attend at least 1 Tone at the Top-MD session each year supplemented by a second Tone at the Top-MD session or 1 Tone at the Top session. The points gained this way fall within the 20 PE obligation (NB: an MD session attracts a minimum of 5 HQ-accredited PE points, and a Tone at the Top session attracts a minimum of 3 HQ-accredited PE points).
- MT members: 10 PE points per year, where at least 1 PE point is obtained from 1 HQ Tone at the Top session and the remaining PE points can be obtained according to preference.

1.2 If an employee acquires more than the required number of PE points in any given year, he/she may carry forward up to 10 PE points (both HQ-accredited and non-HQ-accredited/optional subjects) to the next calendar year. This gives the employee scope to take longer training programmes and furthermore encourages continuous development.

¹ Compliance officers: see Compliance Officer January 2023 Guidelines (HQ website/publications)

- 1.3 A minimum PE obligation of 5 accredited PE points per year will continue to apply to all proxy holders and compliance officers subject to the PE requirement. The annual requirement for MDs to attend Tone at the Top-MD sessions cannot be rolled over. This means that MDs and MT members must attend at least 1 Tone at the Top-MD session every year and optionally a second Tone at the Top-MD session or Tone at the Top session.
- 1.4 You are free to choose the content and form of the training programmes. Both content and soft skills play a role in development. More and more training programmes are being offered online, although it is desirable to alternate these with in-person sessions. Tone at the Top-MD sessions and Tone at the Top sessions are in-person sessions, unless not permitted by circumstances.
- 1.5 Up to a maximum of 10 PE points per year can also be awarded to employees who provide internal or external training programmes. For each whole hour of a training programme, the employee will receive 1 PE point. These points count towards the non-accredited subjects and can be accumulated once a year for the same subject.

2. Accountability

- 2.1 It is up to the organisation and individual employee to substantiate the PE requirement in the annual audit. This can be done by providing evidence that all employees who are subject to a PE requirement have registered for PE or by submitting the firm's accredited HQ training policy.
- 2.2 The trust office will state in the Self Declaration each year that its employees have met the PE obligations set by Holland Quaestor.

3. Awarding PE points

- 3.1 From 1 January 2019, various training organisations/institutions have standard HQ accreditation. A list of these accredited training programmes can be found on the HQ website (Accredited training organisations/institutions | HollandQuaestor) which is regularly updated². All institutions that are already accredited by the government as universities or universities of applied sciences are also HQ-accredited. PE points awarded by other professional/sector organisations (e.g. NBA, NOVA, NOB) are also PE points accredited by HQ.
- 3.2 The number of PE points awarded to a training programme, module, seminar or course is related to the actual number of training hours. This does not include breaks, preparation for sessions and exams (1 PE point = 1 hour). The same applies to online training courses. Training sessions of half an hour or more may be rounded up.
- 3.3 Holland Quaestor's Education Committee is able to accredit an institution or training policy of a trust office when it is not possible to award the points from non-accredited subjects.
- 3.4 Both the institution and the trust office can apply for accreditation of the training policy by completing the application form available from Holland Quaestor, by emailing info@hollandquaestor.nl
- 3.5 PE points are only awarded in advance. The Holland Quaestor Education Committee requires a minimum of 2 weeks to assess these.

4. Confirmation of points awarded

The Education Committee will provide written confirmation when it accredits a programme or a trust office's training policy.

² This means that it is no longer necessary to submit training programmes, modules, seminars or courses taken at these institutions or which are used to organise a training programme for a trust office to the Education Committee for HQ PE points to be awarded.

5. Attendance registration

For each education session, the organiser records participants' attendance. The organiser will provide a written confirmation of attendance after the session, including the number of PE points.

6. Evaluation and quality assurance

The Education Committee may perform random audits on HQ-accredited institutions/programmes each year.

7. Exemption

7.1 Part-time versus full-time work. The PE requirement applies in full to part-time work.

7.2 'Garden leave'. If an employee moves from one trust office to another, he/she simply takes the PE requirement with him/her. After all, the PE requirement is personal.

7.3 If an employee is appointed to a position that has a more onerous PE requirement, this requirement will take effect from the date of appointment and will apply pro rata if it does not take effect at the start of a calendar year.

7.4 Long-term absence (4 months or more). If an employee is absent for a prolonged period, the number of compulsory PE points to be obtained on an annual basis may be adjusted proportionally without the need to submit a prior request for exemption to the Education Committee. The employee is jointly responsible for ensuring that this exemption has been discussed in good time with the persons responsible at the trust office where he/she works, and that this information has been recorded in his/her personnel record.

8. Complaints

Complaints about a failure to award PE points or the awarding of insufficient PE points should be raised with the board. This can be done in writing, by emailing info@hollandquaestor.nl

9. Penalty clause

The trust office is responsible for any failure to meet its continuing Professional Education requirements. However, the board will liaise with the trust office concerned to ask it to provide specific steps as to how it will meet its PE requirement in the future.