



Employment Agency Key Appointment Holder: Pass the MOM Checks

Description

A key appointment holder is a person with general control and management of employment-agency work.

The candidate must meet MOM's eligibility test, can be registered to only one agency, and needs CEI certification before registration under a Comprehensive Licence.

Classify the real job, not the title

MOM's definition turns on general control and management of EA work. A creative corporate title does not remove the regulatory role. Map the candidate's decision rights, supervision and authority over placements. ([MOM EA personnel eligibility](#))

MOM lists undischarged bankruptcy, relevant convictions and prior involvement in a revoked agency as minimum concerns. All candidates remain subject to prevailing criteria. Obtain accurate declarations and use MOM's self-assessment route.

Situation	What changes
Candidate has general control over EA work	Treat the role as a key appointment holder
Comprehensive Licence	Complete CEI before registration
Select Licence	Check registration but not the Comprehensive CEI rule
Replacing the only registered holder	Sequence MOM approval so the licence is never left exposed

Related: [build another regulated employment evidence file](#)

Respect the single-agency rule

A key appointment holder or EA person can be registered to only one employment agency at a time. Check current registration before promising a start date. ([MOM register EA personnel](#))

For Comprehensive Licences, the key appointment holder must attain the Certificate of Employment Intermediaries before registration. Verify the exact licence class and certification record.

Example: An agency has one registered key appointment holder and recruits a new managing director. Resigning the incumbent first creates avoidable licence risk. The agency should screen and certify the successor, seek the required MOM approval, then execute the handover in the approved order.

Prepare identity and pass records

Registration requires identity documentation and a suitable photograph, with additional pass documents for relevant long-term visit pass holders. Use a document checklist tied to the candidate's status.

Comprehensive licence conditions require at least one registered key appointment holder and written MOM approval before a change. Do not terminate the outgoing registration before the incoming approval path is clear.

- Map the candidate's actual control
- Run the MOM eligibility screen
- Check existing EA registration
- Confirm the licence class
- Complete CEI if required
- Prepare identity and pass documents
- Sequence approval and handover

Related: [compare a different controlled corporate role](#)

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