



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. The controlling references checked for this guide are [MOM EA personnel eligibility](#) and [MOM register EA personnel](#).

Choose the branch that matches your case

Situation	Action
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

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. [MOM EA personnel eligibility](#).

Map the candidate's decision rights, supervision and authority over placements. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Run the disqualification screen

MOM lists undischarged bankruptcy, relevant convictions and prior involvement in a revoked agency as minimum concerns. All candidates remain subject to prevailing criteria. [MOM register EA personnel](#).

Obtain accurate declarations and use MOM's self-assessment route. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Respect the single-agency rule

A key appointment holder or EA person can be registered to only one employment agency at a time. [MOM EA personnel eligibility](#).

Check current registration before promising a start date. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Match CEI to licence type

For Comprehensive Licences, the key appointment holder must attain the Certificate of Employment Intermediaries before registration. [MOM register EA personnel](#).

Verify the exact licence class and certification record. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Prepare identity and pass records

Registration requires identity documentation and a suitable photograph, with additional pass documents for relevant long-term visit pass holders. [MOM EA personnel eligibility](#).

Use a document checklist tied to the candidate's status. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Control the handover

Comprehensive licence conditions require at least one registered key appointment holder and written MOM approval before a change. [MOM register EA personnel](#).

Do not terminate the outgoing registration before the incoming approval path is clear. This matters because the decision is not complete until the evidence, timing and responsible person agree.

Use a role-control classification test

Turn the rule into a working aid with columns for the controlling fact, the evidence you hold, the result and the date checked. For this task, the decisive question is to screen, register and sequence the key appointment holder change without breaking licence conditions. A blank evidence cell is a stop sign, not permission to use a remembered number or a marketing summary.

Test at least two plausible branches from the table above. That comparison shows which fact changes the answer and prevents the most convenient scenario from being treated as the only possible one. Label every arithmetic step as an LBRD calculation and keep the official figure beside it.

Add a no-gap regulatory handover timeline

The second aid should expose what the first one can hide: a deadline, cost, handover, alternative route or follow-up duty. Write the downside of being wrong beside each branch. Where the consequence is legal, financial, medical or safety-related, the competent authority and case-specific professional decision remain controlling.

Recheck the live source immediately before the irreversible step. Save only the minimum evidence needed, protect personal details, and note any limitation. Record who will act, the last safe date and the evidence that closes the task.

Stop when the evidence no longer matches

Pause the decision if you encounter relying on job title, registering someone already tied to another ea, starting before cei where required. Those are not small drafting errors; each can change the eligibility, cost, route or safety outcome described above. Return to MOM EA personnel eligibility for the controlling rule and use MOM register EA personnel to check the second part of the decision.

If the authority page, account record, booking screen or case document disagrees with this guide, use the live record. Escalate to the named organisation or an appropriately qualified professional when a deadline is running, a child or adult is unwell, a licence or tax position is uncertain, or an irreversible payment is due. Keep the question narrow and provide the facts needed for a case-specific answer.

Work through a realistic 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.

Before you act

1. Map the candidate's actual control
2. Run the MOM eligibility screen
3. Check existing EA registration
4. Confirm the licence class
5. Complete CEI if required
6. Prepare identity and pass documents
7. Sequence approval and handover

Mistakes that change the answer

- Relying on job title
- Registering someone already tied to another EA
- Starting before CEI where required
- Leaving no registered holder
- Assuming ACRA officer changes update MOM automatically

Related LBRD guides

Next, [build another regulated employment evidence file](#). You can also [compare a different controlled corporate role](#).

Questions readers ask

Who is a key appointment holder?

Someone with general control and management of EA work.

Can one person be registered with two agencies?

No. MOM states each person can be registered to only one EA at a time.

Is CEI always required?

It applies to key appointment holders under Comprehensive Licences; check the exact licence.

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