

**Ministry of Public and
Business Service Delivery
and Procurement**

**Ministère des Services au public
et aux entreprises et de
l'Approvisionnement**



Inspections, Investigations
and Licensing Branch
PO Box 450
Toronto, ON M7A 2J6

Direction des inspections, des
enquêtes et des permis
C. P. 450
Toronto (Ontario) M7A 2J6

Tel.: 416-326-6203
Toll Free: 1 800-889-9768

Tél. : 416-326-6203
Sans frais : 1 800 889-9768

February 19, 2026

To: All registrants under the Collection and Debt Settlement Services Act

Registrar's Bulletin – February 2026

While reviewing recent applications for Collection Agency registration and renewal, we have noted that several applicants have listed a virtual office as the business address for the Collection Agency. Virtual office providers offer services that may include, but are not limited to:

- An address where mail and other packages may be sent, including arrangements to receive, hold, or forward mail and packages.
- The ability to reserve meeting rooms for in-person meetings on an as-needed basis.
- A receptionist, who is employed by the service provider, who may take messages or otherwise redirect persons who visit the office in-person.

Virtual office arrangements do not generally include dedicated offices or workstations.

R.R.O. 1990, Reg. 74 s. 13(10) states *“Every person registered as a collection agency shall operate from a permanent place of business in Ontario that is not a dwelling and that shall be open during normal business hours.”*

R.R.O. 1990, Reg. 74 s. 13(12) states *“Every collection agency or branch thereof shall keep on its premises proper records and books of accounts showing money received and money paid out and such books shall include a receipts journal, disbursements journal, general journal, clients' ledger, general ledger and such additional records as the Registrar considers necessary in accordance with accepted principles of double entry bookkeeping.”*

Further, the Collection and Debt Settlement Services Act (CDSSA), s. 13(1) states: *“The Registrar or any person designated in writing by the Registrar may conduct an inspection and may, as part of the inspection, enter and inspect at any reasonable time the business premises of a registrant, other than any part of the premises used as a dwelling, for the purpose of,*

- (a) ensuring compliance with this Act and the regulations;*
- (b) dealing with a complaint under section 12; or*
- (c) ensuring the registrant remains entitled to be registered.”*

In consideration of these three sections, most virtual office arrangements will not meet the requirements of the CDSSA. In order to meet the requirements of the CDSSA and its regulation, the following must be true as it relates to the place of business of the Collection Agency:

- There must be a permanent dedicated space from which the Collection Agency operates. This could be a dedicated office or workstation, but it must not be shared with any other users or businesses.
- There must be at least one person registered as a collection agency or who is a collector employed, appointed or authorized by the collection agency who is capable of providing service to clients, debtors and members of the public, physically in the place of business during normal business hours.
 - Normal business hours are the hours when a debtor or a member of the public would expect a collection agency to operate.
- All business records, including financial records, both physical and electronic, must be immediately accessible at the place of business at all times.

To be clear, staff of the Collection Agency (e.g. collectors) may continue to work remotely, so long as the Collection Agency is able to meet the above requirements, as well as all other requirements of the CDSSA and its regulations.

If you have any questions about this bulletin, please contact our office at CPOLicensing@ontario.ca.

Sincerely,



Chris Pittens
Registrar of Collection Agencies