Call Center Conduct & Compliance Policy

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Version: 1.0

Effective Date: 2025-10-04

Owner: Head of Customer Experience (CX)

Applies to: All call-center staff (employees, contractors, BPO partners) handling voice or chat interactions.

# 1. Purpose & Scope (Section ID: 1)

## 1.1 Purpose

Establish standards for professional conduct, rapport, privacy, quality, compliance, and escalation during customer interactions.

## 1.2 Scope

Applies to inbound/outbound calls, voicemail, call-backs, live chat, and follow-up communications (email/SMS) initiated as part of a call.

## 1.3 Normative references

This policy is read with: Data Privacy Policy, Information Security Standard, Billing & Refunds SOP, Complaints Handling Procedure, Accessibility Guidance.

# 2. Definitions (Section ID: 2)

2.1 Rapport — Demonstrated empathy, respect, and constructive tone that builds trust.

2.2 PII — Personally identifiable information (name, phone, email, address, national ID).

2.3 PCI Data — Payment card info (PAN, CVV, expiry).

2.4 Vulnerable Customer — A customer with characteristics that may limit their ability to protect their interests (e.g., age, disability, distress).

2.5 Complaint — Expression of dissatisfaction requiring a response or resolution.

2.6 Incident — Event that breaches policy, law, or security controls.

2.7 Working Day — Business day excluding weekends and public holidays.

# 3. Customer Interaction Standards (Section ID: 3)

## 3.1 Greeting & Identification (3.1)

- Must: Answer/greet within prescribed SLA; state your name, company, purpose.

- Must: Confirm customer name/pronouns where appropriate.

- Must not: Proceed without consent when recording disclosures are mandated.

## 3.2 Rapport & Professional Conduct (3.2)

- Must: Acknowledge feelings (“I understand this is frustrating; let me help”).

- Must: Use neutral, respectful tone; avoid blame.

- Must: Offer solution paths and timeframes.

- Must: Paraphrase to confirm understanding before closing.

- Must not: Interrupt repeatedly; use sarcasm or hostile language.

## 3.3 Clarity & Plain Language (3.3)

- Must: Avoid jargon; explain steps and next actions.

- Must: Provide time estimates and follow-up channel (case/ticket number).

## 3.4 Closing (3.4)

- Must: Summarize resolution and next steps; ask if anything else is needed; provide reference/ticket number.

## 3.5 Exceptions (3.5)

In emergencies (threats to safety, fraud in progress), agent may skip non-critical rapport formalities but must document rationale in the case.

# 4. Information Handling & Privacy (Section ID: 4)

4.1 Data Minimization — Collect only info required to resolve the request.

4.2 Authentication — Verify customer identity per KBA/OTP flow before accessing account data.

4.3 PII & PCI — Never store PCI in transcripts. Mask PII in notes per redaction standard.

4.4 Recording Disclosure — Announce recording where required; provide opt-out path if mandated.

4.5 Data Transfer — Use approved systems only; no personal email/messaging apps.

4.6 Retention — Retain recordings/transcripts per Retention Schedule; purge on expiry.

# 5. Compliance & Legal (Section ID: 5)

5.1 Truthful Communication — No false claims or guarantees.

5.2 Marketing Consent — Respect opt-in/opt-out; capture consent changes.

5.3 Regulatory — Follow sector rules (e.g., CPA/POPIA/GDPR/PCI DSS).

5.4 Documentation — Record decisions, promised actions, and timeframes in the case system.

# 6. Billing, Refunds & Remediation (Section ID: 6)

6.1 Eligibility — Check policy/SOP for refund criteria before committing.

6.2 Disclosure — When offering refunds/credits, state amount, method, expected time-to-post, and conditions.

6.3 Prohibited Commitments — Do not promise outcomes beyond authority.

6.4 Escalation — Edge cases → escalate to Billing within 1 working day with full notes.

6.5 Proof & Evidence — Attach invoices, receipts, or logs to the case.

# 7. Complaints & Escalation (Section ID: 7)

7.1 Complaint Recognition — Flag any dissatisfaction that requests action.

7.2 Ownership — Create a case/ticket immediately; assign correct queue (Billing/Tech/Delivery/CX).

7.3 SLAs — Acknowledge in 1 working day; resolve per queue SLA.

7.4 Escalation Ladder — Tier 1 → Tier 2 → Supervisor → Compliance for regulatory risks.

7.5 Customer Updates — Provide status updates per SLA until resolved.

# 8. Quality Assurance & Monitoring (Section ID: 8)

8.1 Scoring Dimensions — Rapport, Accuracy, Compliance, Resolution, Documentation.

8.2 Call Selection — Random + targeted (complaints, refunds, high value).

8.3 Calibration — Monthly calibration across QA leads to align scoring.

8.4 Coaching — Agents receive feedback and action plans; repeat issues escalate.

# 9. Prohibited Conduct & Language (Section ID: 9)

9.1 Prohibited Phrases — “That’s your fault”, “You should have…”, insults, slurs, threats.

9.2 Conflicts of Interest — No personal deals, gifts, or unapproved discounts.

9.3 Off-platform — No customer contact via personal devices/apps.

# 10. Accessibility & Vulnerable Customers (Section ID: 10)

10.1 Identification — Recognize signs: confusion, distress, disability cues.

10.2 Adjustments — Slow pace, repeat-back, plain language, alternative channels.

10.3 Third-party Support — With consent, involve caregivers/authorized delegates.

10.4 Safeguarding — Escalate threats to safety per Safeguarding SOP.

# 11. Training & Certification (Section ID: 11)

11.1 Induction — Privacy, security, product, billing, empathy training.

11.2 Annual Refresh — Mandatory refreshers; role changes trigger retraining.

11.3 Records — Track certifications; non-compliance results in access removal.

# 12. Metrics & SLAs (Section ID: 12)

12.1 SLAs — AHT, First-Call Resolution, CSAT, Complaint Response Time.

12.2 Compliance KPIs — Policy violation rate, redaction accuracy, refund disclosure completeness.

12.3 Reporting — Weekly dashboard to CX leadership; monthly review.

# 13. Incident & Breach Handling (Section ID: 13)

13.1 Reporting — Report suspected breaches within 24 hours.

13.2 Containment — Suspend risky actions; notify InfoSec/Compliance.

13.3 Customer Notice — Coordinate regulated notifications with Legal.

# 14. Disciplinary & Remediation (Section ID: 14)

14.1 Levels — Coaching → Warning → Suspension → Termination (per HR policy).

14.2 Remediation — Corrective training; customer remediation (credits/refunds) when appropriate.

# 15. Governance & Change Control (Section ID: 15)

15.1 Ownership — CX owns; Compliance co-stewards.

15.2 Review — Quarterly review; versioning and change log maintained.

15.3 Exceptions — Documented, time-bound exceptions require Compliance approval.

# Annex A — Rapport Scoring Rubric (Section ID: A)

- Empathy (A.1): Acknowledges feelings; uses validating language.

- Respect (A.2): No blame; polite forms of address.

- Clarity (A.3): Explains steps; avoids jargon.

- Ownership (A.4): Takes responsibility; offers solutions.

- Closure (A.5): Confirms understanding; provides references.

Scoring: 0 (not met), 0.5 (partially), 1 (fully). Threshold to pass rapport: ≥3.5/5.

# Annex B — Redaction & PCI/PII Handling (Section ID: B)

- No storage of card numbers/CVV in transcripts.

- Mask emails/phones in free-text notes.

- Use approved redaction pipeline before indexing.

# Annex C — Prohibited Phrases (Section ID: C)

Examples: “That’s your fault”, “You should have…”, “Calm down”, insults, threats, slurs.

# Annex D — Escalation Ladder (Section ID: D)

Tier 1 → Tier 2 → Supervisor → Compliance/Legal → Executive.

# Annex E — Refund Disclosure Checklist (Section ID: E)

- Amount & method, expected timeline, conditions, case/ticket ID, confirmation sent.

# Annex F — Case Documentation Minimums (Section ID: F)

- Summary, steps taken, artifacts attached, commitments, next follow-up date.