SENSAR — Procurement Procedure for Purchase Costs

Applicable to all purchases made by SENSAR

1. Purpose and scope

This procedure sets out SENSAR's usual purchasing practices for the acquisition of goods, works and services charged as purchase costs, including travel and subsistence, equipment, and other goods, works and services.

It applies to every purchase made by SENSAR's staff, researchers and collaborators, irrespective of the amount, and forms part of SENSAR's internal financial control framework. It has been formally adopted by SENSAR's governing body and is binding on all persons authorised to commit expenditure on behalf of SENSAR in the context of the action.

2. General principles

1. **Best value for money.** Every purchase must be justified on the basis of the best relationship between price, quality, technical suitability and delivery time for the good, work or service required by the action. Where technical suitability does not materially differ between the offers, the lowest price must be selected.
2. **Necessity.** Purchases must be necessary for the implementation of the action.
3. **Absence of conflict of interest.** No purchase may be made from a supplier in which a member of SENSAR's staff, a researcher, a member of SENSAR's board, or a close family member of any of them, holds a financial interest, a management position, or any other interest capable of compromising the impartiality of the purchasing decision, unless the conflict has been disclosed in advance in writing to SENSAR's Treasurer or President and has been expressly authorised by them, in accordance with Section 5.
4. **Proportionality.** The level of formality and the number of comparative quotes required are proportionate to the value of the purchase, as set out in Section 4.
5. **Traceability.** Every purchase must be supported by documentation sufficient to demonstrate compliance with this procedure, retained in accordance with Section 6.

3. Categories of purchase covered

- Travel and subsistence (transport, accommodation, meals, registration fees for conferences or meetings) incurred by personnel travelling on business related to the action.
- Equipment used for the action, where depreciation (and not the full purchase price) is charged as an eligible cost, pro-rated by the rate of actual use for the action and by the portion of the useful life falling within the duration of the action.
- Other goods, works and services, including but not limited to publication and open-access charges, external certification and audit services (including the Certificate on the Financial Statements), venue hire and catering for project meetings, translation, and dissemination materials.

4. Approval thresholds and required documentation

Thresholds apply per purchase (that is, per invoice or, where a single purchasing need is artificially split into several invoices in order to avoid a higher threshold, per the aggregate value of that purchasing need). Where a funded action specifies different thresholds, the more restrictive ones shall apply.

Amount (EUR, excl. VAT)	Requirement	Documentation to be kept on file
Up to EUR 1,500	Direct purchase	Invoice or receipt only. No comparative quotes required.
EUR 1,500 – 8,000	Justified single quote	Invoice, plus one supplier quote and a short written justification of the choice of supplier (e.g. specialised supplier, prior satisfactory experience, urgency).

Amount (EUR, excl. VAT)	Requirement	Documentation to be kept on file
EUR 8,000 – 15,000	Comparative quotes	Invoice, plus a minimum of three comparable quotes from different suppliers, and a short written note recording which quote was selected and why (price, quality, delivery time, or, if the lowest price was not chosen, the reason).
Above EUR 15,000	Documented competitive procedure	A documented call for quotes or tender addressed to at least three potential suppliers, a comparison table of the offers received, the reasoned selection decision approved by the Treasurer or President, the invoice and, where applicable, a written contract or purchase order.

Travel costs booked through a corporate travel policy or a framework agreement with a travel agency are deemed to meet the best-value-for-money requirement without additional comparative quotes, provided that the policy or agreement was itself adopted following the procedure applicable to its own value under this Section.

5. Conflict-of-interest check

Before any purchase above EUR 1,500 is approved, the requester must confirm in writing (by e-mail or on the purchase request form) that, to the best of their knowledge, no conflict of interest exists between the SENSAR personnel involved in the decision and the proposed supplier. Where a potential conflict is identified, the matter must be referred to the Treasurer or President, who may authorise the purchase only after recording in writing the nature of the interest and the reasons why the purchase nonetheless represents best value for money, or must otherwise require the purchase to be submitted to a new competitive process. In the case of funded projects, any conflict of interest liable to affect the impartial and objective implementation of the action must in addition be notified to the granting authority without delay.

6. Roles and responsibilities

Role	Responsibility
Requester	Identifies the need, obtains the quotes required under the applicable threshold, and carries out the conflict-of-interest check.
Treasurer or President	Approves purchases above EUR 8,000, resolves any conflict-of-interest issue, and countersigns the Statement on Usual Purchasing Practices issued for the purposes of the Certificate on the Financial Statements (CFS).
Technical Secretariat	Retains the supporting documentation, reconciles purchase costs against invoices and payments, and prepares the itemised annex to the financial statement.

7. Record-keeping

All documentation listed in Section 4, together with proof of payment, must be retained, as a general rule, for five years from the payment of the balance of the action, or three years in the case of low-value grants, and must be made available to the authority upon request.

8. Exceptions and sole-source purchases

A purchase may exceptionally be made from a single supplier without comparative quotes, irrespective of its amount, where one of the following circumstances applies, provided that the reason is recorded in writing and approved by the Treasurer or President: (a) the good, work or service is available from only one supplier for technical or legal reasons (e.g. proprietary software, exclusive distributor, specific scientific expertise); (b) extreme urgency, not attributable to SENSAR, makes a comparative process impossible; or (c) the purchase continues, or is closely linked to, a prior contract which was itself awarded through a competitive process.

9. Review and effective date

This procedure is reviewed periodically by SENSAR's governing body and applies to all purchases made from the date of its approval set out below.

Approved on behalf of SENSAR:

Dr Daniel Arnal-Velasco
Treasurer, SENSAR

Dr Fernando Cassinello Plaza
President of SENSAR

Date: 16 September 2026