

Guideline for the Responsible Use of „Academic Cloud“ and other AI Services at Flensburg University of Applied Sciences

Supplement to the FUAS AI Directive: Practical
Guidance and Interpretation Aid

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1. Status and Purpose of this Document

This document provides practical guidance on the use of Academic Cloud services, including **GWDG Chat-AI** and other generative AI services (GenAI), for study- and work-related purposes at Flensburg University of Applied Sciences (FUAS). It is addressed to students, teaching staff and researchers, staff in technology and administration, management staff, and all other members of Flensburg University of Applied Sciences who use Academic Cloud and AI services in connection with their function at the university.

This document is a usage guideline that supplements the binding **Directive on the Use of AI Services at Flensburg University of Applied Sciences (FUAS AI Directive)** and provides an overview of key considerations when using Academic Cloud and AI services. The AI Directive establishes the binding minimum standards for the use of AI services at the university. This guideline, by contrast, is of an orientation and explanatory nature and does not create any independent obligations. It replaces neither the FUAS AI Directive nor applicable law, examination regulations, university statutes, employment or civil service obligations, research or cooperation contracts, data protection and copyright provisions, IT security policies, or other binding university regulations. It does not constitute legal advice. Where a specific provision or binding regulation exists, it takes precedence over this guideline. In case of uncertainty, users should seek advice before entering data, uploading files or using AI outputs.

The aim of this guideline is not to prohibit useful AI-supported work, but to clarify which applications are generally permissible, when additional checks are necessary and when use is not permitted.

The basic principle is: for university-related purposes, Academic Cloud and GWDG services should as a rule be preferred over publicly accessible commercial AI services, provided that the specific use in the individual case is permissible. However, institutional provision does not mean that all data may be uploaded or processed without restriction. Users remain responsible for ensuring that their use of these services is appropriate, lawful and compatible with the AI Directive and the applicable institutional regulations.

Legal Framework at a Glance

Various legal requirements apply concurrently to the use of AI at universities. A key legal basis is the European AI Regulation (Regulation (EU) 2024/1689, as amended; the “EU AI Act”). It takes a risk-based approach: Certain AI applications are prohibited; special requirements apply to high-risk applications; and transparency obligations apply to certain AI systems. In addition, the AI Regulation requires organizations to ensure an appropriate level of AI competence among their employees and other persons acting on their behalf. The AI Regulation has been largely directly applicable since August 2, 2026; for certain areas of regulation, in particular certain high-risk AI systems, later implementation deadlines apply. The EU AI Act does not replace existing legislation. When using AI, therefore, particular attention must be paid to the General Data Protection Regulation (GDPR) and the Schleswig-Holstein State Data Protection Act, the Copyright Act, regulations on the protection of confidential information and trade secrets, as well as labor, civil service, higher education, and examination laws. Depending on the specific use case, contractual obligations, research and cooperation agreements, or other legal provisions may also be relevant. The Flensburg University of Applied Sciences AI Guidelines specify these requirements for the use of AI services in a university context. This guideline provides support for their practical implementation. In case of doubt, the relevant advisory offices at the university should be consulted.

2. What is Academic Cloud?

Academic Cloud is an academic service portal for study, teaching, research and work. It is provided via the **GWDG Academic Cloud infrastructure**. GWDG stands for *Gesellschaft für wissenschaftliche Datenverarbeitung mbH Göttingen* (*Society for Scientific Data Processing mbH Göttingen*) and is a joint institution of the University of Göttingen and the Max Planck Society. Compared with publicly accessible commercial tools such as ChatGPT, Academic Cloud offers an academic infrastructure with clearer institutional regulations for access, service provision and data processing. After logging in, users can access various services, including collaborative working tools, communication tools, data visualisation services and AI-supported services. Staff

and students of Flensburg University of Applied Sciences already have access to Academic Cloud via their institutional login credentials

For AI services such as GWDG Chat-AI, attention must be paid to which model is used before entering content. For use at Flensburg University of Applied Sciences, only locally hosted models are currently envisaged. Should the available offering change, before using external models it must be checked whether they are approved under the FUAS AI Directive and the applicable data protection, security and confidentiality requirements.

A prerequisite for the use of AI services for official purposes is the basic training defined by the university. Participation is documented in accordance with the university's requirements.

Information on the training currently offered is provided by the university.

Access

Academic Cloud can be accessed at <https://academiccloud.de/de/>. After selecting "Login", users can either enter their institutional email address or search for Flensburg University of Applied Sciences via "Federated Login" (Föderierte Anmeldung). Federated login enables authentication via the institutional account.

Further information

An overview of GWDG Chat-AI is provided by the GWDG documentation:

<https://docs.hpc.gwdg.de/services/ai-services/chat-ai/>

A public handout from TH Lübeck explains many Chat-AI features: [https://thldl.th-luebeck.de/loop/Chat_AI_\(GWDG\)](https://thldl.th-luebeck.de/loop/Chat_AI_(GWDG))

This guideline focuses in particular on the use of AI services such as „Chat-AI“. However, the same basic principles apply to other AI services as soon as personal data, confidential information, copyright-protected material, research data or institutional documents are involved.

3. Institutional Provision Reduces Risks but Does Not Release Users from Responsibility

As a rule, Academic Cloud and GWDG Chat-AI should be preferred over publicly accessible commercial AI tools for university-related purposes because they are provided within an academic infrastructure and take account of German and European data protection

requirements. For use at Flensburg University of Applied Sciences, only locally hosted models are currently envisaged. For locally hosted GWDG models, processing takes place under the applicable conditions within the providing academic infrastructure. This reduces certain risks compared with many publicly accessible commercial tools, but not all of them.

Open-source tools, locally hosted systems and academic services can still raise questions concerning data protection, confidentiality, copyright, IT security, research ethics, examination regulations, employment law obligations and contractual restrictions. These checks remain necessary even for institutionally provided services.

AI-generated results must always be checked. They may be incorrect, incomplete, misleading, outdated, biased or unsuitable for the respective context. Users must not rely exclusively on AI outputs as a basis for decisions concerning students, applicants, employees, research participants or other persons.

4. Fundamental Questions to Ask Before Using AI

Before text, files, images, code, data or other data and information are entered into Chat-AI or another AI service, the following checklist questions should be asked:

- ☐ **Competence** – Despite the required basic training, do I lack sufficient AI literacy and/or subject-matter expertise for this specific task to understand how the GenAI system processes the input and output, and to assess whether the result is correct, appropriate, reliable and fit for purpose?
- ☐ **Mandatory AI use by students** – Are students required to use an AI service for a coursework or examination achievement without appropriate and documented competence training on purpose, limits, risks, permitted inputs and documentation obligations having taken place beforehand?
- ☐ **Model selection** – Is it unclear whether the model used is approved under the FUAS AI Directive and suitable for the intended purpose and the intended content?
- ☐ **Personal data** – Does the input contain personal data (e.g. names, email addresses, student ID numbers, grades, application documents, interview data, employment records, identifiable research data, etc.)?

- ☐ **Particularly sensitive data** – Does the input contain particularly sensitive data (e.g. health data, information on a disability, religious or political views, trade union membership, biometric data, information on ethnic origin, sexual orientation, disciplinary proceedings or conflict situations)?
- ☐ **Confidential institutional information** – Does the input contain internal documents, committee documents, appointment procedures, examination documents, minutes, strategy papers, financial data, passwords, access tokens or other confidential and/or security-relevant information?
- ☐ **Third-party funded, cooperation or contractual relevance** – Does the input contain material from third-party funded, cooperation, consortium, transfer or contract research projects, from non-disclosure agreements or from other contractually protected contexts?
- ☐ **Copyright-protected or third-party material** – Does the input contain complete textbooks, journal articles, manuscripts, student work, proprietary teaching material, licensed images, source code, datasheets or material from cooperating partner organisations or partner companies?
- ☐ **Decision relevance** – Does the use influence an assessment, grade, admission, hiring, disciplinary, selection, funding or other decision that may significantly affect a person?
- ☐ **Output risks** – Could the output itself contain personal data, confidential information, copyright-problematic content, biased assumptions, stereotypical depictions, factual errors or misleading content?

If any of these questions is answered with "Yes", use is not automatically permitted. It may only be allowed under certain conditions or is prohibited. In case of doubt, users should minimise the amount of data, remove unnecessary details, anonymise the input, use generic examples instead of real documents or seek advice before use.

Anonymisation means that individuals can no longer be identified.

Pseudonymisation alone is still considered processing of personal data and is therefore not automatically sufficient as a measure for AI inputs.

5. Traffic Light Model for Practical Application

The following traffic light model serves as practical orientation. It does not replace the FUAS AI Directive, applicable statutes, examination regulations or a required case-by-case assessment.

✅ Usually permitted

The following applications are generally permissible provided that no personal, confidential, copyright-protected, examination-relevant, security-relevant or contractually protected information is entered and no specific regulation prohibits or restricts the use.

Target group	Possible Use Cases
Students	Permitted: using Chat-AI to understand difficult concepts, generate practice questions, brainstorm structures, obtain language suggestions for one's own non-confidential texts, practise programming concepts, create learning and revision plans, or receive explanations at different levels of difficulty – provided this does not conflict with examination, course or assignment rules.
Teaching staff and researchers	Permitted: drafting learning activities, creating generic examples, developing initial ideas for case studies, developing test questions, improving public course descriptions, translating public or self-authored texts, and preparing non-confidential teaching materials.
Staff in technology and administration	Permitted: drafting publicly accessible texts, improving the style of event invitations, creating generic templates, summarising public legal or policy documents, structuring non-confidential process descriptions, or creating first drafts of FAQ pages.

In all cases, responsibility remains with the users, who must check accuracy, appropriateness, tone, legal suitability and factual correctness before use or publication. Unverified AI outputs must not be passed on as reliable information

⚠ Permitted only under certain conditions

The following applications require additional caution and may only be used if the necessary legal, institutional and procedural conditions are met. In particular, the FUAS AI Directive, the Examination Procedures Regulations, the Regulations on the Conduct of Electronic Examinations, the Regulations on Safeguarding Good Academic Practice as well as the respectively applicable study, examination, data protection, copyright, IT security and contract regulations are decisive.

Area of application	Conditions
AI use in assessed student work	Permitted only within the framework of the instructions of the teacher responsible for the course or assignment or the person authorised to conduct examinations, and of the applicable examination regulations. Students must follow the specific instructions; where documentation is required, AI use must be declared transparently and sufficiently.
Use of anonymised research data	Permitted only if individuals can no longer reasonably be identified. Project approvals or consent declarations must permit this processing, and there must be no contractual or ethical restrictions. Pseudonymised data are considered personal data as long as re-identification cannot be ruled out. In case of doubt, clarify the permissibility of use with the Research and Development Department, the Data Protection Officer, the Equal Opportunities Officer, the Diversity Officer or the Ethics Committee.
Use of copyright-protected material	<i>Input:</i> Third-party copyright-protected content may only be entered or uploaded if a viable legal basis exists, such as own rights, permission, a licence or a statutory exception. Permissibility depends on the specific purpose and must be assessed separately for research, teaching and administration. <i>Output:</i> AI outputs must not be reused, published or distributed unchecked. In particular, it must be checked whether they contain protected third-party content and whether citation, labelling or licence obligations must be observed. If in doubt, refrain from use until the legal situation has been clarified.

Area of application	Conditions
Non-confidential internal or institutional working materials	Only permitted if the documents are not confidential, contain no personal data, are not part of a restricted or procedure-bound matter, and may lawfully be processed for the intended purpose.
AI support for feedback or examination design	Only permitted if no identifiable student work, confidential examination data or protected personal data are uploaded. AI may support the preparation of feedback, assessment criteria or generic examples, but must not make or replace any assessment, grading or selection decision. The final decision always remains with the person authorised to conduct examinations or the responsible Examination Board
AI-generated images, audio or video content	Only permitted if there is no deception about the artificial generation, third-party rights are respected and any required labelling or transparency obligations are complied with. This applies in particular to public relations communications, storytelling, testimonials or realistic-looking depictions of people.
Projects for the integration, adaptation, fine-tuning or further development of AI models	Require an additional legal, technical and data protection review before roll-out. Depending on the case, the Legal Counsel, the Data Protection Officer, IT Security and the Research and Development Department, the Staff Councils, the Equal Opportunities Officer and the Diversity Officer must in particular be involved.

✗ Not permitted

The following uses are fundamentally not permitted unless there is an explicitly authorised institutional process and a secure legal basis

Area	Impermissible Use
IT security-relevant data	Passwords, access tokens, security keys, internal system information, non-public vulnerability information or other security-relevant material must <u>not</u> be uploaded.
Plagiarism / deception	AI-generated texts, code, analyses, images or similar must <u>not</u> be presented as independent, self-authored work where this would conflict with examination, integrity or publication standards.
Personal examination and administrative data	Grade lists, examination documents and minutes, enrolment data, disciplinary records, applications for compensation for disadvantages, health data, information on disabilities, counselling records, complaint records, applicant data, personnel files, employee appraisals or comparable personal data must <u>not</u> be entered into Chat-AI or any other AI service in order to create drafts, produce summaries or support decisions.
Confidential internal documents	Internal committee, board, appointment, strategy, legal, financial, procurement or other restricted university or institute documents must <u>not</u> be uploaded unless an authorised process explicitly permits this.
Non-public third-party materials	Unpublished manuscripts, peer review materials, fully copyright-protected textbooks, licensed news articles, student submissions, examination submissions, proprietary source code, company data, NDA-protected material or other proprietary data and documents must <u>not</u> be uploaded without explicit permission and a secure legal basis.
AI-supported decision support in processes involving personal data	AI-supported decisions about students, applicants, employees, research participants or other persons are <u>not</u> permitted unless there is a reviewed process authorised by the university and explicit approval has been granted.

Area	Impermissible Use
Automated assessment, grading or selection decision	Automated assessment, grading, credit recognition, selection decisions or deception assessments based on an AI service are <u>not</u> permitted. AI may be used in the examination and assessment context only in a supporting and preparatory capacity; the final decision always remains with the person authorised to conduct examinations or the responsible Examination Board.
Sole AI decision-	AI must <u>not</u> be the sole basis for grades, admissions, hiring, staff appraisals, disciplinary measures or other decisions that significantly affect individuals. Human responsibility must not be delegated to an AI system
Deception or disinformation purposes	AI must <u>not</u> be used to produce content that deceives others, impersonates others, plagiarises or spreads false information. In particular, AI-generated or AI-modified images, audio or video content must not be used in public communications in a way that deceives about their artificial generation or modification; required labelling and transparency obligations must be observed.

6. Gender Equality and Non-Discrimination

The university bears a special responsibility to ensure that AI systems are used not only efficiently but also fairly, transparently and inclusively. The use of AI services must not cause or reinforce discrimination on the grounds of gender, ethnic origin, religion, worldview, disability, age or sexual identity. This corresponds in particular to the statutory requirements of the General Equal Treatment Act (AGG) and the Higher Education Act of Schleswig-Holstein (HSG) and forms the basis for a fair and democratic university community.

AI systems can reproduce or even reinforce social inequalities and stereotypical attributions from their training data. Systems that create texts, images or translations learn from large quantities of data from the internet – where stereotypes and injustices are often present. AI can therefore adopt these prejudices or even amplify them. For example, with translations or images, certain groups may be depicted or evaluated differently – depending on gender, origin or other personal characteristics. It is therefore important to pay close attention to whether the depiction is fair and free of prejudice and stereotypes.

AI services should be designed to be as accessible as possible and comply with the requirements of the Disability Equality Act (BGG) and the Web Content Accessibility Guidelines (WCAG) 2.1.

Wherever possible, users should have equal access to AI applications and be able to use them without restriction, regardless of physical, cognitive or technical conditions.

When creating AI prompts and using AI outputs, attention must be paid to gender-equitable and inclusive language (for guidance on gender-sensitive language, see also <https://hs-flensburg.de/hochschule/organisation/einrichtungen/gleichstellungsbuero/gendersensible-sprache>). The results of AI systems should be checked for non-discrimination before they feed into decision-making processes or public communications. In person profiles, case examples, texts or images, care must be taken to ensure that, for example, professions, leadership roles, care work or technical competence are not stereotypically assigned to particular genders or groups of people. This applies in particular to texts, assessments and recommendations generated by AI. In cases of doubt, the Equal Opportunities Officer and the Diversity Officer must be involved before use.

At the same time, the university promotes the responsible use of AI in support of inclusion and equality goals, provided this is compatible with the established principles of the directive. One example is improving the accessibility of teaching materials. Here, AI is used as an instrument of equality, not as a substitute for human responsibility and co-determination.

7. Third-Party Funding, Cooperations and Trade Secrets

In third-party funded, transfer, cooperation and contract research projects, additional obligations may arise from cooperation, consortium and funding agreements, non-disclosure agreements and the protection of trade and business secrets. Project documents, confidential information from cooperation partners, unpublished research results, company data, technical specifications, proprietary source code or NDA-protected material must not be entered into AI services unless explicit permission and a secure legal basis exist.

In cases of doubt, the Research and Development Department must be involved before use; depending on the case, the Legal Counsel, the Data Protection Officer, the Equal Opportunities Officer, the Diversity Officer and/or IT Security must also be involved.

8. Role-Specific Guidance

The traffic light model presented above applies to all users. The following points highlight particularly relevant aspects for the respective groups at Flensburg University of Applied Sciences.

Students

- The use of Academic Cloud and GWDG Chat-AI for learning support (e.g. concept explanation, exercises, structuring ideas, language improvement, feedback on one's own non-confidential drafts) is permitted.
- For assessed work, the respective course, module, assignment or examination rules as well as the applicable examination regulations always apply. AI-generated content must not be submitted as independent work unless this is explicitly permitted.
- Where the teacher responsible for the course or assignment or the person authorised to conduct examinations provides for a documentation, declaration or citation obligation for AI use, this must be fulfilled in a comprehensible manner.
- Students are obliged to critically examine AI outputs and not to treat them as authoritative explanations or verified sources.
- If you have questions, please always contact your teachers first. They can then involve other advisory services if necessary.

Teaching Staff and Researchers

- AI tools may be used for preparing teaching material, language revision, idea generation, generic examples, self-test questions and non-confidential research drafts.
- Particular care is required in examination and research contexts. Teachers must communicate clearly whether and how AI may be used in assignments and formulate any documentation, declaration or citation obligations unambiguously.
- Teaching staff and researchers must not upload identifiable student work, examination materials, unpublished third-party manuscripts or confidential research data without an approved basis.
- Automated assessment, grading, credit recognition or selection decisions based on an AI service are currently not approved. AI may be used in the examination and assessment

context only in a supporting and preparatory capacity. The subject-specific evaluation, assessment and responsibility always remain with the person authorised to conduct examinations or the responsible Examination Board.

- If students are required to use an AI tool for a course, assignment or coursework or examination achievement, appropriate and documented competence training on use, limits, risks, permitted inputs and documentation requirements must take place beforehand.
- KI-Werkzeuge dürfen zur Vorbereitung von Lehrmaterial, Sprachrevision, Ideengenerierung, generischen Beispielen, Selbst-Test-Fragen und nicht-vertraulichen Forschungsentwürfen eingesetzt werden.

Staff in Technology and Administration, Staff with Leadership Responsibility

- AI tools can be used for generic text drafts, public communications, templates, summaries of public information and non-confidential process descriptions.
- Student records, grade lists, application documents, personnel files, health data or information on disabilities, disciplinary matters, committee and/or board documents, access credentials, confidential internal documents or comparable protected information must not be uploaded unless there is explicit approval by the university.
- While AI may help with wording and structuring, it must not replace responsible human decision-making in administrative, employment or study-related matters. AI-supported decision support in processes involving personal data may only be used if there is an explicitly reviewed process authorised by the university and the corresponding approval is in place.

9. Where Can Further Advice Be Obtained?

Users should check the relevant regulations and seek advice before using Academic Cloud or GWDG Chat-AI if the planned application involves personal data, particularly sensitive data, examination material, student submissions, applicant or employee data, confidential university or institute documents, cooperation documents and contracts, unpublished research, copyright-protected third-party material, trade secrets or AI-supported decision support.

In cases of doubt or risk-related uses, the respective specialist offices must be involved before entering data, uploading files or using AI outputs. Students should always contact their teachers first. Other members of the university may contact the respective advisory offices directly. Legal and contractual questions are to be clarified with the Legal Counsel, data protection questions with the Data Protection Officer, security-related questions with IT Security, questions on gender equality, discrimination and inclusion with the Equal Opportunities Officer and the Diversity Officer, questions on staff-representation-relevant internal measures with the responsible Staff Council, and questions on third-party funded, transfer and cooperation projects with the Research and Development Department.

In cases relevant to research ethics, the Ethics Committee must be involved. For examination-related procedural and administrative questions, the Examinations Management and Student Services as well as the applicable examination regulations, in particular the Examination Procedures Regulations and the Regulations on the Conduct of Electronic Examinations, must be observed.

University Resources and Contacts

Students should always contact their instructors first with any questions!

Bereich	Kontakt / Link
Data protection & Data Privacy	FUAS Data Privacy Officer E-Mail: datenschutz@hs-flensburg.de https://hs-flensburg.de/datenschutzerklaerung
IT-Security	FUAS University IT Center Team E-Mail: it-support@hs-flensburg.de

Bereich	Kontakt / Link
Legal Department	FUAS Legal Counsel E-Mail: justiziar@hs-flensburg.de
Equal Opportunity (Equality and Diversity)	FUAS Equal Opportunity Officer E-Mail: gleichstellungsbeauftragte@hs-flensburg.de FUAS Diversity Officer E-Mail: diversitaetsbeauftragte@hs-flensburg.de
Employee Representatio n	Employee Representation in Internal Measures Relevant to Employee Representation Law Personalrat für Technik und Verwaltung (PR TuV) E-Mail: personalrat-tuv@hs-flensburg.de Personalrat für den wissenschaftlichen Dienst (PR w) E-Mail: personalrat-w@hs-flensburg.de https://hs- flensburg.de/hochschule/organisation/gremien/personalvertretung
Rules & Bylaws	https://hs-flensburg.de/hochschule/ordnungen
Academic Programs & Teaching, Exam Policies	https://hs-flensburg.de/hochschule/ordnungen/allgemein/258
Central University Library (ZHB) –Information on Copyrights	https://www.zhb-flensburg.de/suchen-finden/zugang-zu-e-medien#c154384
Research & Development	https://hs-flensburg.de/forschung

Bereich	Kontakt / Link
Ethics committee – Information & regulations	https://hs-flensburg.de/hochschule/organisation/gremien/senat/ethikkommission/hinweise-und-regeln

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Approved by	FUAS Executive Board (Präsidium der Hochschule Flensburg)
Responsible for updates	Vice president for study programme development, digitalization, equality, and diversity (2026) Coordinating Office: Iris Mainusch
Agencies to Consult for Technical Matters in Cases of Doubt	<i>Students should always contact their instructors first with any questions!</i> The Legal Department for legal matters; the Data Protection Officer for data protection matters; the IT Security Council for security-related matters; the Equal Opportunity and Diversity Officer for matters related to equality, diversity, or accessibility; the relevant staff council for internal measures relevant to staff representation law; the Research and Development Department for matters related to third-party funding, collaborations, and projects; Ethics Committee for cases involving research ethics; Exam Administration and Student Services for exam-related procedural and administrative matters.
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Review and Update Frequency	As needed, e.g. in the event of changes to the AI policy, the legal situation, the services used, the available models, or any other need for adjustment
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