



Fact Sheet on Transparency and Disclosure Requirements for the Use of Generative AI

August 2026

Since August 2, 2026, the transparency requirements set forth [in Article 50 of the EU AI Act](#) have been in effect. They are intended to ensure that individuals can recognize when they are interacting directly with an AI system or are being presented with artificially generated or manipulated content.

This information sheet supplements the [HWR Berlin guidelines on the use of artificial intelligence dated August 4, 2025](#). The regulations set forth therein, particularly those regarding studies, exams, research, and the handling of personal or confidential information, remain unaffected.

The transparency requirements under Article 50 of the EU AI Act do not mean that every use of generative AI must be labeled.

The following principles apply at HWR Berlin:

- Individuals are informed when they interact directly with an AI system.
- Images generated entirely by AI must always be labeled as such.
- Artificially generated audio and video content, or content created or edited primarily using AI, must be labeled accordingly.
- Texts created primarily using AI must undergo subject-matter and editorial review prior to publication.
- Teaching materials created primarily using AI must be reviewed for accuracy and clearly labeled.

1. When must the use of an AI system be disclosed?

According to Article 50 of the EU AI Act, individuals must be able to recognize or be informed in an appropriate manner when they are interacting directly with an AI system, unless this is already obvious. However, this exception must be interpreted narrowly, so that in cases of doubt, a notice must always be provided in an appropriate form.

This applies, where available, to chatbots on university websites, AI-supported academic advising or information services, AI assistants and AI tutors in Moodle or on other learning platforms, as well as voice bots and interactive avatars that respond autonomously to questions from university members or external individuals.



An appropriate notice might read, for example

“You are communicating with an AI-powered assistance system. The responses are generated automatically and may be incorrect or incomplete.”

A disclaimer is not required if employees use AI solely in the background as a work tool, for example, to create a draft text, write summaries, or prepare an email. Regardless, the HWR Berlin’s guidelines for the permissible and responsible use of AI must be followed in such cases.

2. When must images, audio, and video content be labeled?

Article 50 of the EU AI Act specifically requires the labeling of so-called “deepfakes.” This refers to artificially generated or manipulated image, audio, or video content that may give the impression of being authentic.

Images generated entirely by AI that are published by HWR Berlin or used in teaching materials should, as a general rule, be labeled.

Appropriate phrasing includes

“AI-generated image”

“AI-generated stock image.”

If a real image has been significantly altered by AI, this should also be indicated.

Labeling is not required if AI was used only for standard technical edits such as color, exposure, or noise corrections and the content and message were not significantly altered.

Artificially generated or significantly manipulated audio and video content must also be clearly labeled. This applies in particular to synthetic voices or depictions of real people.

3. Must texts created using AI be labeled?

Article 50(4) of the EU AI Act establishes a specific transparency requirement for AI-generated or AI-edited texts that are published to inform the public about matters of public interest. An internal memo, for example, does not fall within this scope. Rather, the content must be a publicly accessible post, such as on the university’s website or on social media platforms. Topics of public interest may include, for example, articles on higher education policy.

The labeling requirement may be waived if the content was reviewed prior to publication by a person with relevant expertise and professional judgment, and the HWR Berlin or a designated person assumes editorial responsibility.

An appropriate statement for texts that have not been reviewed or edited is

“This content was generated by artificial intelligence.”



4. What applies to teaching materials?

Teaching materials in closed teaching and learning environments are generally not considered public texts within the meaning of Article 50 of the EU AI Act.

Regardless of this, HWR Berlin applies a higher standard of transparency to teaching materials. AI-generated teaching materials or those created primarily with AI must be reviewed for content and editorial accuracy by the responsible instructor before they are used. Significant AI-generated content should also be clearly labeled. This applies, for example, to lecture notes, Moodle content, presentations, exercises, case studies, summaries, or explanatory texts.

An appropriate wording is

“This teaching material was created using generative AI and has been reviewed for content accuracy by the instructor.”

Images generated entirely by AI must also be labeled in teaching materials in accordance with the guidelines in this handbook.

5. What applies to existing content?

Article 50 of the EU AI Act has been in effect since August 2, 2026.

Content created and already published before that date generally does not need to be labeled retroactively. A comprehensive review of existing content is therefore not required. If older AI-generated content is newly published, republished, or substantially modified, the current transparency requirements should be taken into account.