

AI Transparency: Required Notices and Wording for Goethe University Frankfurt

The [European Code of Practice on Transparency of AI-generated Content](#) (hereinafter the “AI Act”) took effect on August 2, 2026. It requires companies and organizations, in certain situations, to disclose when content has been primarily created or altered by AI, or when users are interacting with an AI system.

The transparency obligation is outlined in Article 50 of the EU AI Act. Article 50 is only one part of the Act’s broader set of rules for AI systems. Given its relevance to and expected frequent application of within the university setting, this information sheet focuses on this article.

Going forward, any content created or modified with AI at Goethe University Frankfurt must, in certain cases, be clearly identified when published on external communication channels and formats, including the website, in social media posts, in flyers, or on posters.

The labelling requirement is particularly important when AI-generated content is not reviewed and adjusted by a human. Below are several practical examples for different formats (text, images, video, audio) as well as guidance on when a corresponding label is required.

The requirement does not apply retroactively to content produced before August 2, 2026, although users are free to add a label afterwards for transparency reasons.

Format-Specific Labeling Requirements

All required labels must comply with the German Accessibility Strengthening Act [Barrierefreiheitsstärkungsgesetz – BFGS], including visual cues (sufficient contrast, readable font size, not obscured or covered), Alt text (image descriptions compatible with screen readers), audio cues (clearly audible and not masked by other sounds), and multilingual content (labels must appear in every language used in the material).

The phrasings below are the recommended standard wordings for labeling AI-generated content created and/or published by Goethe University members.

AI-Generated Texts

A text wholly or mainly produced by AI that is intended to inform the public about matters of public interest and is published without meaningful human oversight (including editorial review, factual corrections, or final approval) must be labeled as AI-generated. No label is required if one of the following conditions are met: a person reviews the content or adapts it where necessary, and a clearly identifiable natural or legal person takes editorial responsibility for the publication.

The disclosure also does not apply to cases where AI is used in a purely supportive function, including as grammar or style checks, for translations that are reviewed by a person, for internal documents not intended for publication, or to generate marketing copy that does not involve manipulated media, i.e. deepfakes.

Examples: AI Labeling in Texts

- **Example 1:** Someone posts an article on the website that was entirely written by an AI and published without any changes or checks.
→ This article **must be labeled as AI-generated**; otherwise readers might assume it was written by a human.
- **Example 2:** Someone uses an AI to produce a first draft, then revises it to adjust phrasing and to add their own style.
→ **No label is required**, since a person retains the decisive creative and editorial control.

Recommended Wording for Labeling AI-Generated Texts:

Please insert one of the following sentences at the beginning or at the end of the text/article:

- German: Anmerkung: Dieser Text wurde von einer KI erstellt.
- English: Note: This text was created with AI.

If a text/article was translated by AI and not subsequently reviewed, please use:

- German: Anmerkung: Dieser Text wurde mit KI übersetzt.
- English: Note: This text was translated with AI.

AI-Generated Images, Video and Audio

Under Article 50(4) of the EU AI Act, images, audio or video that were created or manipulated by AI and that resemble real people, objects, places, institutions or events – and are likely to mislead viewers about their authenticity (so-called deepfakes) – must be labeled as artificially created or manipulated.

This provision does not apply to works that are clearly artistic, satirical, fictional or otherwise lack a realistic reference; these do not require labeling.

If AI is used only for technical corrections (e.g. color correction, sharpening or noise reduction), no label is required. If the content is changed in a way that affects its substance or realism, however, a label is required.

Kindly note that some social media platforms operate their own terms of use for the labeling of AI-generated content.

Examples: AI Labeling in Images

- **Example 1:** A person creates an AI-generated image showing a person who appears to be real.
→ The image **must be labeled as AI-generated**, since viewers could mistake it for a real photograph.
- **Example 2:** An image generated with AI consists solely of graphic illustrations (i.e. icons, comics, abstract graphics, caricatures).
→ **No label is required**, because the image does not present a false reality.

- **Example 3:** A person edits a photo using AI tools for sharpening, color correction or exposure.
→ **No label is required**, since the content was not substantively altered and the creative authorship remains with a human.

Recommended Wording for Labeling AI-Generated Images

Place the label directly on or next to the image where possible (for example with an icon or in the copyright line):

- German: © Urheber*in | KI-generiert
- English: © Creator | AI-generated

On social media, if available, enable the platform's AI-content flag and also include the copyright notice on the image:

- German: © Urheber*in | KI-generiert
- English: © Creator | AI-generated

Examples: AI Labeling in Video and Audio

- **Example 4:** A video is produced using an AI voice that imitates a real person (AI voiceover).
→ The video must be **labeled as AI-generated**, since viewers might perceive the voice as authentic
- **Example 5:** A person edits their own video using AI-assisted editing features (e.g., in standard editing software like Adobe).
→ **No label is required**, since the content was not substantially changed and creative control remains with a human

Recommended Wording for Labeling AI-Generated Video and Audio

You may either provide an icon in the player interface or state the notice in the description or at the beginning of the recording:

- German: Diese Audioaufnahme wurde mithilfe von KI erstellt.
- English: Note: This audio recording was created using AI.

For video kindly use the following in the description, copyright line or as a short on-screen caption at the start or end:

- German: Dieses Video wurde ganz oder teilweise mit KI erstellt.
- English: Note: All or part of this video was created using AI.

Interacting with AI

The AI Act also requires that users must be able to tell when they are interacting with an AI rather than a human; examples include website chatbots, automatically generated email replies sent without human oversight, or voicebots used in telephone contact.

Any AI chatbots employed by the university – for instance in teaching (self-study tools in OLAT) or in research (surveys and other data collection) – must be clearly labeled.

Notifying Creators When AI Modifies Their Work

The Bundesverband Hochschulkommunikation (German Association for University Communication) recommends that creators be informed when their content (text, image, video or audio) has been altered by AI, even if contractual usage or editing rights would otherwise permit those changes.

Consequences of Non-Compliance

Violations of the labeling requirement under Article 50 of the EU AI Regulation (AI Act) can result in significant penalties for both the university as well as individual staff members.

Helpful Links / Further Information

- Recommendations from the Bundesverband Hochschulkommunikation on using AI in university communications: <https://www.bundesverband-hochschulkommunikation.de/projekte/umgang-mit-ki-in-der-redaktion/>
- idw – Information on the EU regulation’s AI labeling obligations: <https://r.mailing.idw-online.de/mk/mr/sh/7nVTPdZCTJDXOdE378WVg7KxGCBOwQF/yXclWcJjEmW4>
- EU Code of Practice on Transparency of AI-generated Content: <https://digital-strategy.ec.europa.eu/en/policies/code-practice-ai-generated-content> incl. the full-text version: <https://eur-lex.europa.eu/eli/reg/2024/1689/oj?eliuri=eli%3Areg%3A2024%3A1689%3Aoj&locale=en>
- Compliance Checker (Chief Information Office), containing explanations and obligations under the AI Regulation: <https://www.uni-frankfurt.de/121486462/Informationen>

Last updated: September 21, 2026

Editorial Responsibility: Goethe University Frankfurt’s PR & Communications Office
(onlinekommunikation@uni-frankfurt.de)