

AI IN UNSUPERVISED EXAMS

REQUIREMENTS AND RECOMMENDATIONS (KIP-PE)

Guidance for Faculty and Students on Responsibilities and Best Practices in the Use of AI

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1 Introduction and Context

Technische Hochschule Lübeck is fundamentally open to the use of artificial intelligence in teaching and learning contexts. The goal is to harness the potential of these technologies for modern forms of teaching and learning without compromising the principles of academic integrity, fairness, and transparency.

This guide is intended to establish a common framework for the responsible use of AI in teaching and learning. It provides faculty with guidance on how to regulate the use of AI, particularly with regard to copyright, data protection, and in the context of unsupervised written exams. At the same time, it ensures that the rules of good academic practice and the integrity of academic work are upheld.

When people talk about artificial intelligence (AI) in an educational context today, they usually mean **generative AI (genAI)**—that is, systems that can generate **new content such as text, images, code, or videos** based on large amounts of data. Technically, many of these applications are based on **large language models (LLMs)** such as GPT (OpenAI), Claude (Anthropic), or Gemini (Google), as well as image generators like DALL·E, Midjourney, or Stable Diffusion.

These models use **neural networks** and **statistical methods** to calculate the most likely continuation of an input and, based on that, generate text or other content that appears plausible and understandable to humans. Although they lack a true understanding of language or content, they can handle increasingly complex tasks through specific instructions (known as *“prompting”*).

However, content generated by AI systems must be **critically examined and evaluated**, as it may be erroneous, distorted, or incomplete (e.g., “hallucinating”). Identifying problems in AI-generated texts therefore requires critical thinking, prior knowledge, and a willingness to conduct one’s own research.

1.1 Data Protection

The protection of personal and confidential data is of central importance when using generative AI systems. Many providers of generative AI store user inputs on servers that are often operated in the U.S. or other third countries. This data may be used to further develop the systems—often by default, unless the use for training purposes is explicitly disabled. However, even when data sharing is disabled, it cannot be completely ruled out that information will be used for training purposes.

Students and faculty must carefully distinguish between their personal registration data and the content they enter into genKI systems. During registration, personal data such as name, email address, and IP address are typically processed. Personal data belonging to third parties may generally only be entered into genKI systems that have been explicitly approved for this purpose by the university’s. The same applies to confidential, sensitive, research-related, or medical information. Even anonymization often does not provide sufficient protection, as contextual clues may allow for the identification of individuals.

Since many genKI systems are not currently operated in full compliance with the GDPR, there must be no obligation to use an unsuitable system. **Faculty members may only require students to use genKI if**

a GDPR-compliant tool appropriate for the assignment is available. Since April 2026, a corresponding tool—ChatAI (GWDG)—has been available at Technische Hochschule Lüneburg. All university members can access the tool via single sign-on through the Academic Cloud (GWDG): <https://chat-ai.academic-cloud.de>.

1.2 Copyright

Uploading copyrighted works to a generative AI system is legally complex, as this process generally constitutes reproduction and may therefore violate copyright law (Gesetz über Urheberrecht und verwandte Schutzrechte (Urheberrechtsgesetz) 1965:16), unless appropriate permission has been obtained.

AI systems do not act independently and cannot assume legal responsibility. Content generated purely by AI generally does not enjoy copyright protection, as under German law this protection is granted only to natural persons.

Students and faculty members are **responsible for the content they create with the support of genKI**—including any copyright or data protection violations. If AI-generated content is presented as one's own work, this may be considered an act of deception (see below 2.5 Prohibited Use of AI Tools).

1.3 Prohibition on Using AI for Exam Grading

Instructors may only grade written exams using AI systems within strict limits. It is generally permitted, for example, to upload a student's seminar paper to an AI system, provided it is ensured that the tool does not reuse the entered data as training data, store it permanently, or use it in any other way. This is ensured, for example, when the analysis is performed using ChatAI (GWDG), provided that only the models hosted internally by GWDG are used. A list of all models available via ChatAI can be found on the [GWDG model overview page](#).

Automated decision-making, in particular the final assignment of grades by an AI system, is not permitted under Article 22 of the GDPR (Datenschutz-Grundverordnung DSGVO 2016:22) or under the AI Regulation. A final decision must always be made by a human (Hoeren 2025:30; Verordnung über künstliche Intelligenz (KI-Verordnung) 2024:14) .

2 Exams

The use of generative AI tools is fundamentally changing exams at universities, as students can use generative AI to create texts, generate solutions, or complete programming tasks without having fully gone through the underlying learning process. Not all exam formats are equally affected by these developments.

Exam formats in which control over the tools used is guaranteed or that require immediate, spontaneous independent work are least affected by the unauthorized use of generative artificial intelligence (AI). These include, for example, oral exams (exam interviews and colloquia), proctored exams (written exams), and process-oriented and practical tasks (e.g., lab work, oral presentations).

Such examination formats will likely play a greater role in the future, because the use of AI can only be restricted in controlled examination situations. In many cases, controlling the use of AI in exams can be useful to ensure that the acquisition of basic competencies can be assessed. In particular, when it comes to acquiring fundamental subject knowledge, structuring one's own thoughts, or developing basic academic writing skills, a ban may be necessary so that students can develop these abilities on their own and demonstrate them in the exam (to prevent "deskilling").

Conversely, when the competence in using AI tools itself is being assessed, AI tools should be explicitly permitted and actively utilized. Their use is an integral part of the learning objective in this context.

2.1 Implications of Generative AI Tools for Unsupervised Written Examinations

Exams that are not taken under supervision are particularly affected by the availability of generative AI. These include written assignments completed unsupervised, such as project papers, seminar papers, term papers, and theses. In these cases, the unauthorized use of generative AI cannot be reliably proven technically, and a ban is therefore only enforceable to a limited extent under the law.

A blanket ban on the use of generative AI in unsupervised assessment formats makes little sense because students use generative AI tools at home or on personal devices without instructors being able to reliably prove it—especially since common AI detection tools are technically unreliable and legally problematic. A blanket ban therefore tends to foster a culture of mistrust rather than ensuring fair exam conditions. At the same time, the use of AI increasingly mirrors real-world work requirements in academia and the professional world, so that a complete exclusion would hinder the development of essential future skills.

It makes more sense to further develop examination formats, make AI use transparent, and empower students to use AI in a reflective and responsible manner while adhering to the principles of good academic practice. These principles include, among other things, strict honesty regarding one's own work and the contributions of third parties (Deutsche Forschungsgemeinschaft 2019).

To promote transparency and traceability in the examination process, clear and unambiguously communicated regulations and criteria are necessary. They form the basis for the evaluation of examination performance (vgl. Stabsstelle Qualität in Studium und Lehre, Hochschule Kaiserslautern 2024:4).

Faculty members are expected to

- in a timely manner and in accordance with university standards—in line with the examination periods specified in the PVO or before the start of the thesis—determining whether and how genAI is permitted in the examination,
- clarify which conditions (e.g., documentation requirements) apply when using AI
- clarify the requirements regarding students' own work.

Since the regulations and criteria depend on the course, instructors are encouraged to draft an AI policy tailored to their specific course. Using the University of Bamberg's interactive **AI Policy Generator** (Herrmann und Universität Bamberg 2026) can make this process easier. Using editable building blocks, instructors can click together their own AI policy and copy it to the clipboard. The Karlsruhe Institute of Technology also offers an editable form for specifying **AI use** (Sexauer, Zentrum für Mediales Lernen (ZML), und Karlsruher Institut für Technologie (KIT) 2026).

Students are expected to

- adhering to the conditions set by the instructor for the permissible use of generative AI
- ensure transparency, e.g., by documenting AI use, including a reflective section in the methodology section, or by labeling AI output,
- certifying, through the signed declaration of originality, that they have complied with the conditions specified for the course.

2.2 Declaration of Originality

A declaration of originality for examinations not taken under supervision serves as a key tool for promoting transparency and accountability. It obligates students to comply with the specified requirements for labeling and disclosure, particularly with regard to the use of AI. The specific guidelines are determined by the respective instructors responsible for the course, depending on the exam format. By submitting the declaration of originality, students acknowledge these conditions and assume responsibility for the consequences of non-compliance ("deception"; see §28 PVO, Technische Hochschule Lübeck 2006).

We recommend adding the following wording to the Declaration of Originality in the future: **"Generative AI was used exclusively to the extent documented and in accordance with the instructor's guidelines."** A sample Declaration of Originality can be found in the Appendix.

2.3 Permitted Aids and Original Work

A general ban on the use of AI as an aid is neither legally enforceable nor appropriate. In particular, there is a lack of sufficient specificity and technically reliable means to verify compliance with such a ban (Lehre virtuell, Goethe Universität Frankfurt 2025)

AI may be used provided that it does not replace the student's own work relevant to grading and that its use is disclosed and documented.

Examples of permissible use may include:

- Use of generative AI to improve the form of a work whose content was written independently (translation, stylistic revision, text abridgment, improvement of clarity), depending on the learning objective.
- Use of generative AI as a source of ideas or inspiration, followed by a predominantly independent elaboration.
- Provide support for commenting on program code and assist with debugging during programming, depending on the learning objective.

A key element in dealing with generative AI in exams is **defining what constitutes independent work**. Instructors must specify which parts of an exam must be completed by the students themselves. This definition forms the basis for all further decisions. Due to subject-specific differences, universal rules are not possible—decisions are made at the department or course level.

Transparency is crucial: Students must clearly understand what is permitted and what is not. Students must be clear on what is expected of them and what constitutes the independent work they are required to demonstrate in the exam.

2.4 Documentation of AI Tool Use

For unsupervised written exams, students must document the sources they used in accordance with the instructions provided by the supervising instructor. There are various ways to document the use of AI tools. A very general approach is to list all tools used in an appendix, similar to a bibliography, and to clearly describe the nature of the AI support. An example might look like this:

Hilfsmittel & Literatur

Hilfsmittel

1. ChatGPT Version 5, OpenAI: <https://chatgpt.com>
Hilfe bei Definitionen und sowie allgemeine sprachliche Unterstützung
2. Claude, Version Opus 4.1, Anthropic: <https://claude.ai>
Hilfe bei der Erstellung der Textstruktur
3. Consensus, Version Juni 2025: <https://consensus.app/>
Literaturrecherchen
4. DeepL Translate, DeepL SE: <https://www.deepl.com/de/translator>
Übersetzung von Textpassagen
5. DeepL Write, DeepL SE: <https://www.deepl.com/de/write>
Neuformulierung von Textstellen
6. Stable Diffusion, Stability AI: <https://stablediffusionweb.com>
Bildgenerierung

Literatur

Rimbaud, Arthur (1958). Das trunkene Schiff. Aus dem Französischen übersetzt von Paul Celan. Wiesbaden: Insel-Verlag

Figure1 : Example of a research log for AI-based tools, Universität Basel, Vizerektor Lehre 2025:5,
CC BY-SA 4.0

Particularly in the case of exams in which competencies in working with AI are the subject of assessment, it may be advisable to require students to provide a rationale for the use of such tools. In such cases, more detailed documentation of AI use may also be required, for example, in the form of the inputs used and the resulting outputs (Stabsstelle Qualität in Studium und Lehre, Hochschule Kaiserslautern 2024:7–8).

For written assignments, it may also be required that students document their interaction with generative AI in an appropriate format, such as a research diary or journal (Universität Basel, Vizerektor Lehre 2025:3). Additionally, students may be required to submit the complete history of their AI interaction. Such personal documentation supports the traceability of the work process and enables students to transparently explain their approach in the event of inquiries.

	KI-basiertes Hilfsmittel	Einsatzform	Betroffene Teile der Arbeit	Datum	Bemerkungen
1	DeepL Translator	Übersetzung von Textpassagen	Ganze Arbeit	01.06.2025-04.06.2025	
2	ChatGPT (OpenAI)	Erstellung von Textvorschlägen, im Text bzw. in Fussnoten gekennzeichnet	Kapitel 1, S. 3, Abschnitt 2	02.06.2025	
3	ChatGPT (OpenAI)	ChatGPT wurde zum Thema der Arbeit befragt, die Ergebnisse mit eigener Recherche verglichen.	Kapitel 2, S. 5-7; siehe Chat-Verlauf im Anhang	03.06.2025	
4	ChatGPT (OpenAI)	Neuformulierung der Einleitung in das Kapitel 3	Kapitel 3, S. 12, erster Absatz	03.06.2025	
5	Dream (Wombo)	Erstellung von Visualisierungen	Abb. 2, S. 7 Abb. 9, S. 15	04.06.2025	Abb.2, S.7: stark überarbeitet, nur Visualisierungs-idee von Dream
	...	...	...		...

Figure2 : Example of a research journal on AI-based tools, Universität Basel, Vizerektor Lehre 2025:3),
CC BY-SA 4.0

2.5 Prohibited Use of AI Tools

If AI-supported tools are used in an impermissible manner, this is considered deception within the meaning of § 28 of the Examination Procedures Regulations (Prüfungsverfahrensordnung, PVO). This applies in particular when students provide false information in the declaration of originality. The consequences of proven deception are regulated in the PVO.

3 Summary for Those in a Hurry

Obligations for Faculty and Students

- Personal data must generally not be entered into AI applications; confidential, sensitive, research-related, or medical information must not be entered into public AI applications (data protection). Even anonymization often does not provide sufficient protection, as contextual clues may allow for identification of individuals.
- Uploading copyrighted texts and materials to AI systems (such as ChatGPT, Copilot, or Claude) generally requires the permission of the copyright holder (copyright law).
- Students and faculty members are responsible for the content they create with the assistance of generative AI—including any copyright or data protection violations.

Obligations for Faculty

- Faculty members may not grade written exams using AI systems, or may do so only within strict limits.
- Instructors must determine, in a timely manner and in accordance with university standards, whether and how AI is permitted in exams, based on the exam periods specified in the PVO or before the start of the thesis.
- Instructors must clarify which conditions (e.g., documentation requirements) apply when using AI.
- Instructors must clarify the requirements regarding students' own work.

Obligations for Students

- Students must adhere to the established conditions for the permissible use of generative AI.
- Students must ensure transparency, e.g., by documenting AI use, including a reflective section in the methodology, or by labeling AI-generated output.
- Students must confirm, by signing the declaration of originality, that they have complied with the conditions specified for the exam.

4 References

Datenschutz-Grundverordnung DSGVO. 2016.

Deutsche Forschungsgemeinschaft. 2019. „Guidelines for Safeguarding Good Research Practice. Code of Conduct“. doi:10.5281/ZENODO.3923601.

Gesetz über Urheberrecht und verwandte Schutzrechte (Urheberrechtsgesetz). 1965.

Herrmann, Dominik, und Universität Bamberg. 2026. „KI-Policy-Generator für die Lehre. Ein Tool zum Erstellen einer KI-Richtlinie für Lehrveranstaltungen. Version v3“.

Hoeren, Thomas. 2025. „Rechtsgutachten zur Bedeutung der europäischen KI-Verordnung“. 563 KB. doi:10.13154/294-13421.

Lehre virtuell, Goethe Universität Frankfurt. 2025. „Handreichung für Lehrende – Umgang mit generativer KI in Prüfungsleistungen“.

Sexauer, Andreas, Zentrum für Mediales Lernen (ZML), und Karlsruher Institut für Technologie (KIT). 2026. „Formular zur Angabe der KI-Nutzung“.

Stabsstelle Qualität in Studium und Lehre, Hochschule Kaiserslautern. 2024. „Eigenständigkeitserklärung für Prüfungen Eine Handreichung zur Verwendung mit besonderem Fokus auf den möglichen Einsatz von KI-Tools“.

Technische Hochschule Lübeck. 2006. *Satzung der Fachhochschule Lübeck über fachübergreifende Bestimmungen für das Prüfungsverfahren - Prüfungsverfahrensordnung - (PVO)*.

Universität Basel, Vizerektor Lehre. 2025. „Leitfaden ‚Aus KI zitieren‘ Umgang mit KI-basierten Tools im Studium“.

Verordnung über künstliche Intelligenz (KI-Verordnung). 2024.

5 Figures

Figure 1: Example of a research journal on AI-based tools, University of Basel, Vice Rector for Teaching 2025:5), CC BY-SA 4.0 8

Figure 2: Example of a research journal on AI-based tools, University of Basel, Vice Rector for Teaching 2025:3), CC BY-SA 4.0 9

Appendix

Proposed Declaration of Originality

I hereby declare that I have prepared this written paper independently and without any unauthorized outside assistance. All sources and resources used are fully and accurately cited. Passages taken verbatim or in essence from other works are appropriately marked. Generative AI was used exclusively to the extent documented and in accordance with the instructor's guidelines.

I am aware that providing false information in this Declaration of Originality will be considered an attempt at academic dishonesty.