

Principles for Working with GenAI within FGGA

1 July 2025

Generative Artificial Intelligence (GenAI) is being increasingly adopted within FGGA. The technology itself is also developing. GenAI can potentially improve the quality and efficiency of our faculty, but we must be ready to work with it deliberately and with awareness.

There are already several pilots that demonstrate how this evolving technology can be safely and constructively applied to support staff and students. Other faculties are also exploring GenAI applications, and there is much to be gained by sharing knowledge and experience across the university.

Within FGGA, we want to take a proactive and positive approach to GenAI.

Our approach for the use of GenAI within FGGA is that **we train, inform and support our employees so that:**

1. **We entrust our employees** – We seek to support our staff to make *informed decisions*. Our staff are capable of responsibly exploring GenAI tools with the right support. Thus, we will focus on training, sharing information, and providing safe working environments.
2. **We explore the opportunities** – Responsible experimentation helps us better understand both the risks and the potential gains of GenAI. Therefore, we will stimulate pilots and encourage experimentation. We want to know what this technology *can* do. To ensure we learn from these experiments, we will focus on capturing and sharing lessons learned.
3. **We work transparently and align with public values** – We prioritize transparency in how and where GenAI is used. We respect privacy regulations and intellectual integrity in all GenAI use.
4. **We remain aware** – We recognize that GenAI also brings real risks and limitations. Therefore, we will remain critical, evaluate tools carefully, and set clear boundaries to ensure ethical and purposeful use.

To properly entrust our staff, we need to provide them with sufficient support and guidance. We need a **programmatic approach** at FGGA that includes pilots, training, and clear information which is consistent. We also need to give explicit permission for staff to explore GenAI tools under defined and safe conditions.

Our program will consist of:

- **An e-training module with Basic training for all employees** which is easily accessible, easily updatable, and self-paced. Can serve as a reference point.
- **Per domain, more specific trainings** for the operations (bedrijfsvoering) domain, and user guides for how to safely use these tools. For education, funding for this is being sought through qualitietsmiddelen, but funding must also be secured for education and bedrijfsvoering domains.

- **A list of tools** along with the conditions of how and when they can be used. For key tools, such as Microsoft Copilot, technical explainers for how these tools work and an overview of privacy and security considerations.
- **An AI 'Green Light' Checklist** which can be used to judge whether or not it is permissible and advisable to use GenAI. **(Attached below)**
- Where possible, **calls for pilot projects** using AI.

This FGGA program is currently under development.

The FGGA guidelines are a living document which will remain responsive to the developments in field. It should be noted that there is no university wide guidelines, policy or training available. Such policies might appear in the future and then, FGGA-program will be recalibrated against the university wide program.

FGGA GenAI Framework

Understand the data, understand the technology, understand the impact. What is not forbidden is allowed.

Below is a summary of the FGGA framework. It poses 3 questions you should answer before using AI.

- If the answers to all these questions are positive, *go ahead!* You have quite a lot of freedom in the tools you can use for these use cases.
- If you answer 'unknown' or 'undecided', you must *only use Microsoft Copilot* and you may reach out for a discussion with us at responsibledata@fqga.leidenuniv.nl.
- If the answer to any of these questions is negative, *stop, and see if you can mitigate the risks, for example, by anonymising or pseudonymising the data.*

Understand the data	Understand the technology	Understand the impact	What does that mean for me?	
Is it permissible to process this data with GenAI?	Will GenAI deliver good results?	Am I comfortable with the costs/side effects?	Which Tools may I use?	What are my responsibilities as a user?
● Permitted under GDPR and AI Act. No IP, copyright or confidentiality concerns.	● Content creation where review is easy, accuracy is not essential, and novelty is not important.	● The value outweighs the cost and potential collateral impact.	You may use any tool here. However, the best practice is to use Microsoft Copilot and firms who operate and store/(sub)process information in the EU.	You must uphold copyright. You should inform the recipient if your work is not substantially altered from an AI generated output.
● Inaccurate or generic content may have negative consequences.	● Not relying on GenAI for true novelty or perfect accuracy.	● The effort of checking GenAI's work is lower than doing the work myself.	You may only use Microsoft Copilot.	Same as above.
● Special category data (GDPR); autonomous decision making.	● High-stakes financial, legal, strategic decision; producing replicable scientific work.	● I feel personally uncomfortable with the environmental, social or ethical impact.	You are strictly forbidden from either processing this data at all or using GenAI for this data.	You must not use GenAI.

Understanding the Data

Data has to clear 3 hurdles before it can be shared with a GenAI.

1. Is it permitted by regulation to share?

In all cases, the AI Act and GDPR apply to our use of digital technology. These regulations strictly forbid certain practices. This holds true even if a certain tool may be permissible to use. There are prohibited practices under both GDPR and the AI Act:

Category	Definition	Within FGGA, hypothetical example:
Processing Special Categories of Personal Data without Consent	Includes data revealing racial or ethnic origin, political opinions, religious beliefs, or health/sexual orientation, unless explicit consent is given.	<ul style="list-style-type: none"> - Without consent, processing transcripts from interviews and asking for a summary of common themes. - Scraping a social media profile to attempt and place the user on the political spectrum
Automated Decision-Making without Human Involvement	Decisions made solely by algorithms that significantly affect individuals are restricted unless consented to or legally authorized.	<ul style="list-style-type: none"> - Feeding CVs into GenAI and automatically accepting the recommendation on which candidate to hire. - Automatically grading a paper without any review or independent human thinking.
Manipulating Behaviour	Use of AI systems to manipulate human behaviour subliminally or subvert or impair autonomy.	<ul style="list-style-type: none"> - Using automatic AI-generated communications to manipulate students into following study routes.
Monitoring and/or manipulating emotions	Use of AI systems to infer emotions in a workplace or educational setting.	<ul style="list-style-type: none"> - Using AI to infer students' emotional state (for example, during an exam)
Social Scoring by Governments	AI used by public authorities for social scoring that results in unjust or harmful treatment.	Not strictly applicable to a university, but it might still be foreseeable that we become complicit in this activity if we uncritically share data.
Real-Time Remote Biometric Identification	Real-time facial recognition or other biometric identification in public spaces is generally banned (exceptions for law enforcement may apply).	<ul style="list-style-type: none"> - Automatic detection for staff/students for admittance into LU buildings.

2. Is it permitted by patent and copyright law to share?¹

Does it contain confidential or secret business information? For example, does it contain financial forecasts, contract drafts, procurement data, or information which is protected by any kind of confidentiality agreements?

Is the content protected by a copyright licence?² As a general rule of thumb, if you created the content you have the right to publish it under Creative Commons licence and thereafter share it with GenAI:

- Published academic works (such as academic papers from a journal) bear restrictive copyright licences which make it forbidden to feed into a GenAI tool;
- However, you retain the copyright of your own published academic work;³
- Teaching materials (slides, lecture notes, etc.) remain the copyright property of the University, but the University gives you the right to share these under a Creative Commons license;⁴
- As reflected in the FGGA Data Protocol, Leiden University also explicitly entitles researchers to share their research data under the same licences;⁵

3. Is it wise to share?

Even when sharing is legal and permissible, it may still be unwise. Ask yourself the following:

- **Could the output be misunderstood or misused?** If context is lost, the GenAI could generate outputs that are misleading.
- **Will the output be relied on by others?** If your output will be published, cited, or used for decision-making, apply extra caution. Review and validate the results thoroughly.
- **Is there a reputational risk to yourself, colleagues or the university?** Consider how sharing this content with an AI tool — or using AI-generated output — might reflect on you or your institution if made public.

When in doubt, seek a second opinion or choose for more human oversight.

¹ See also the University Library's Copyright Information Office <https://www.library.universiteitleiden.nl/researchers/copyright-information-office> 25 June, 2025

² See the full copyright policy of the University (updated in 2025) https://www.organisatiegids.universiteitleiden.nl/binaries/content/assets/algemeen/reglementen/leiden-university-employer-copyright-regulations_4.2.2025.pdf June 25, 2025

³ <https://www.library.universiteitleiden.nl/researchers/copyright-information-office/copyright-on-teaching-materials> 25 June, 2025

⁴ See this explainer for the different types of Creative Commons licences. <https://creativecommons.org/share-your-work/ccllicenses/> 25 June, 2025

⁵ <https://www.library.universiteitleiden.nl/researchers/open-access/background-and-policies> 25 June, 2025

4.  There is lots of information which is perfectly OK to share

For instance, information that is already publicly available — such as reports, interviews, blog posts, or datasets published with Creative Commons — can generally be used with fewer concerns about intellectual property, confidentiality or data protection.

- However, as with any form of reuse, it remains your responsibility to ensure that such material is used ethically and in compliance with relevant licenses. It is always your responsibility to properly reference your sources.

Understanding the Technology

Generative AI works by **predicting** an expected outcome based on historical patterns. In comparison, a digital calculator follows strict, predefined rules to deliver precise and replicable answers based on mathematical logic. That means that this GenAI technology is ultimately probability-based rather than rule-based.

This makes GenAI **good at** tasks that involve working with natural language, like summarising and rewriting, and at working with well defined formats (like emails, presentations, papers, lists) where there are historical examples. It also makes GenAI good at generative visual output where there is some room for error (such as pictures, emojis, graphs).

At the same time, the probabilistic nature of GenAI means it is **less effective** for tasks that demand precise, replicable and complex interpretative operations. GenAI is still 'guessing' the outcome of mathematical operations and thus it is an unreliable assistant on data analysis. GenAI is also trained on historical data, meaning it still struggles to generate truly new or creative insights that it has never seen before.

It is therefore important to match the type of task to GenAI's strengths, and always apply human oversight to the results.

GenAI is Good at:	GenAI is OK at:	GenAI is Poor at:
<ul style="list-style-type: none"> • Summarising existing information, such as writing summaries of public documents, meetings, papers and webpages • Rewriting text for clarity, either to expand or contract • Generating creative ideas • Formatting emails or reports 	<ul style="list-style-type: none"> • Drafting routine policy text (non-binding) • Generically analyzing data sets and documents • Translating general content (non-sensitive) • Answering general-purpose knowledge questions • Generating slides for internal presentations 	<ul style="list-style-type: none"> • Creating genuinely new ideas • Making legal or financial decisions • Interpreting nuanced policy implications • Performing accurate data analysis • Producing the replicable results

Understanding the Broader Impact of GenAI

Beyond the clear and exciting benefits that GenAI brings, there are also clear costs, though these may be indirect. Even if how you want to use AI is safe, legal and appropriate, it may still be undesirable in certain contexts because of the indirect impact this technology has on society and the environment.

1. Environmental Impact

Using large-scale AI systems consumes significant amounts of energy and water.⁶⁷ Each interaction may seem low-cost, but widespread use across an institution can lead to substantial ecological footprints—especially if tools are hosted in regions with limited renewable infrastructure or scarce water resources.

2. Intellectual Property and Institutional Sovereignty

Leiden University generates a lot of high-quality data. When we share that data with third-party AI tools, we are typically contributing to the training data or internal knowledge of commercial providers. This raises the quality of *their* product but does not necessarily provide a direct benefit to us. This raises concerns about:

- **Knowledge leakage** to private firms or non-EU jurisdictions. Information shared with GenAI tools almost always becomes proprietary knowledge of the developers.
- **Vendor lock-in**, where our most important knowledge and workflows become dependent on external (often opaque and expensive) commercial tools.
- **Loss of control** over how academic or strategic content is used and commercialised.

3. Ethical Concerns

Because of GenAI's *averaging* and *middling* method of operation, it is feasible that over-reliance on GenAI lowers the overall quality of work and skill that human agents develop.

- **De-skilling and disintermediation:** Replacing human work with AI-generated outputs may limit learning opportunities for students and remove expert judgment from decision processes.
- **Bias amplification:** AI models reflect historical biases in their training data, which can lead to the reinforcement of stereotypes or marginalisation of underrepresented perspectives.
- **Homogenisation of thought:** Because AI tends to reproduce the most statistically probable answer, it risks eroding intellectual ingenuity and discouraging original or dissenting viewpoints.

⁶<https://e360.yale.edu/features/artificial-intelligence-climate-energy-emissions>

⁷ <https://www.unep.org/news-and-stories/story/ai-has-environmental-problem-heres-what-world-can-do-about>

Practical Examples of When to Use AI

- You may use any GenAI tool to process this data. However, by default, we recommend using Microsoft Co-Pilot linked to your ULCN account. Beyond that, choose for tools whose (sub)processors that are based in the EU. Guidance on tool providers is always changing.
- You should only use Microsoft Co-Pilot linked to your ULCN account to process this information.
- It is forbidden to process this information (at all or using GenAI).

GenAI Use Cases: Permissibility vs. Concerns

Below are some examples of potential use cases in FGGA:

Use Case	Why / If the Data Is Permissible	Remain Aware of Potential Risks / Concerns
Summarizing a public policy document, from the University or a government Ministry	● Publicly available, non-sensitive	May oversimplify or misrepresent key points if not reviewed by a subject expert
Expand provided bullet points into a formal academic prose, for example for writing a memo to the Faculty Board	⚠️ ● Permitted if work is own IP and it contains no personal or confidential information	May introduce tone mismatch or misleading phrasing, harming your credibility
Teacher works with GenAI to write a course syllabus	● No personal data	GenAI may alter tone or clarity, or remove pedagogical intent
Creating social media captions based on a press release	⚠️ ● Permitted if there is no personal data in original text	May introduce tone mismatch or misleading phrasing, harming institutional credibility
Drafting FAQs and explainer emails from internal policies	⚠️ ● Permitted if policies are not confidential and contain no personal information	GenAI may generalize or overstate responses, leading to miscommunication
Sharing lecture notes and slides, and generating example questions for an exam or quiz	⚠️ ● Permitted if non-sensitive information, no student information, and content is published under CC license	Suggestions may be inappropriate, inaccurate, or poorly aligned with learning goals
Drafting an internal memo from meeting notes	● Permitted if no personal or confidential information	Possible distortion of intent, structure, or strategic messaging
Rewriting job vacancy text	● Public, non-sensitive information	May introduce bias or reduce specificity, harming inclusivity or clarity

Rewriting a grant proposal	⚠️ ● Permissible if it contains no confidential or third-party content	May misrepresent finer points of research; may lower the quality of the prose
Creating meeting notes from a transcription	● Permissible if anonymized or explicit consent has been documented	Possible misattribution, distortion of intent, misquoting. May omit or distort key details
Summarizing student evaluations by course	● Permissible if anonymized and aggregated (most are by default)	Risk of de-anonymization or misrepresenting perspectives
Suggesting edits to a GROW meeting summary	⚠️ ● Permissible if anonymized and non-sensitive	Risk of hollow or generic suggestions that undermine authenticity
Summarizing interview transcripts conducted for research	⚠️ ● Strict preconditions for consent must first be met. Contains identifiable or sensitive data	Forbidden unless explicit consent is documented, and data is fully anonymized
Drafting a disciplinary letter for a student or staff member	● Contains personal, sensitive or legal information	Forbidden under GDPR; risk of legal liability and reputational harm
Select a winning candidate from provided CVs or letters of intent	● CVs contain personal information. Involves profiling and automated decision-making	Forbidden under the GDPR AI Act unless exceptional pre-conditions and human oversight are met
Transcribing meetings regarding health-related disclosures	● Special category personal data under GDPR	Forbidden unless explicit consent is obtained and additional safeguards are in place
Summarizing meeting minutes from confidential labor negotiations	● Strategic and sensitive institutional content	Forbidden due to confidentiality and legal obligations
Generating a <i>definitive</i> grade or assessment based on a written assignment	⚠️ ● Without sufficient human oversight breaches AI Act	Forbidden if used without substantive human judgment or oversight
Teacher uploads student papers for feedback or evaluation	● Work remains intellectual property of student	Forbidden without informed consent, opt-out and registration. LU takes an ethical stance here
Processing biometric data for identification	● Involves special category data	Forbidden unless lawful basis and technical safeguards are explicitly in place