

The AI Act's literacy obligation in 4 steps

Article 4 of the AI Act (EU 2024/1689) requires providers and deployers of AI systems to ensure, as far as possible, that their staff and anyone else working with these systems on their behalf have sufficient AI literacy.

AI literacy is defined in Article 3 (56) of the AI Act as:

- **skills, knowledge and understanding of AI** that allow providers, deployers and affected persons to make informed decisions about the deployment of AI systems;
- **awareness about the opportunities and risks of AI** and possible harm it can cause.

The implications of the AI literacy obligation for organisations are not always clear and vary depending on the context in which AI is used. The Knowledge Centre for Data & Society has therefore developed this information sheet to explain the key aspects of this obligation.

In four steps, **we explore the AI literacy obligation**, so that organisations understand what the obligation entails and know how to ensure that their staff and other stakeholders have the required level of AI literacy.

ADDITIONAL INFORMATION

- [Q&A on AI literacy](#)
- [AI literacy Programs in Europe - Support Article 4 of the EU Artificial Intelligence Act](#)
- [European Digital Innovation Hubs](#): One-stop shops in Europe offering targeted services and support (including on AI).
- [Digital Skills & Jobs Platform](#): Provides open access to quality information and resources related to digital skills.
- [AI-geletterdheid in de werkcontext: bouwstenen, definities en meetkaders \(Knowledge Centre Data & Society\) - only available in Dutch](#)
- [In 7 stappen naar AI-geletterdheid in jouw organisatie. Wegwijzer AI-geletterdheid en AI-competenties \(Knowledge Centre Data & Society\) - only available in Dutch](#)

Year of publication: 2025
This document is available under a [Creative Commons CC BY-NC-ND 4.0 license](#).

Step 1

WHAT DOES THE AI LITERACY OBLIGATION ENTAIL?

Article 4 of the AI Act requires providers and deployers to ensure that their staff and anyone else on their behalf using AI systems have sufficient AI literacy. Providers are individuals or organisations that develop or place on the market an AI system or a general-purpose AI model. Deployers are anyone using an AI system under their own authority.

This obligation also applies to contractors, service providers and customers working with AI systems on behalf of an organisation. Article 4 also applies to both public and private entities, within and outside the EU, as long as the AI system is launched, used or affects people in the EU.

The importance of AI literacy is not to be underestimated. Even if an organisation is not officially using AI, shadow use can still occur (for example, people using ChatGPT under the radar). The risk of shadow use is that it can lead to data leaks, for example. Personal data being unlawfully disclosed to third parties can potentially also result in other infringements (e.g. of GDPR).

Step 2

HOW TO MEET THE AI LITERACY OBLIGATION?

There is no one-size-fits-all approach to AI literacy. However, there are some minimum requirements. Providers and deployers of AI systems must:

1. ensure a common understanding;
2. consider the role of the organisation (provider or deployer); and
3. raise awareness of the risks and how to mitigate them.

In order to develop a process and set up training courses, the organisation must consider the following elements: the technical knowledge, experience, training and education of the staff, the context of the AI use, and the individual or groups of people to whom the system will be applied.

The AI Office also offers a ['living repository on AI literacy'](#), sharing examples of best practices that can serve as inspiration. However, adopting these practices does not automatically mean compliance with Article 4 of the AI Act. Finally, ['In 7 stappen naar AI-geletterdheid in jouw organisatie. Wegwijzer AI-geletterdheid en AI-competenties'](#) can also help organisations get started on AI literacy.

Step 4

WHAT ARE THE PENALTIES FOR NON-COMPLIANCE WITH THE AI LITERACY OBLIGATION?

Penalties for non-compliance with Article 4 of the AI Act will be determined by national law and should be proportionate, based on the individual case and taking into account the nature and severity of the infringement, as well as its intentional and negligent nature. The risk of non-compliance increases when evidence reveals an incident caused by a lack of appropriate training and guidance of staff or other individuals.

Belgium is currently reviewing the AI Act penalty system, so it is not yet clear which penalties will apply in the event of non-compliance with Article 4.

Even though it is not mandatory to document all internal training sessions relating to AI literacy, organisations are being recommended to do so for legal reasons. This will make it easier for them to demonstrate how they are complying with the obligation. For example, in the event of an AI incident that may have been caused by a lack of AI literacy.

Step 3

WHO WILL ENFORCE THE AI LITERACY OBLIGATION, AND WHEN?

Article 4 of the AI Act came into force on 2 February 2025, but enforcement and penalties will only be introduced later on.

By 2 August 2025, EU member states had to designate at least one national market surveillance authority to monitor and implement Article 4 of the AI Act. These national market surveillance authorities will start enforcing the AI literacy obligation from 3 August 2026, with penalties imposed for non-compliance from that date.

In Belgium, the FPS Economy is responsible for designating the competent authorities. No final decision has yet been taken in this regard. In other words, there is currently no specific insight into how the national authorities will enforce Article 4.

What is certain, however, is that the European AI Office will have to work closely with the European AI Board to support appropriate implementation in the various Member States."