

AI Literacy in Focus

What You Need to Know

Article 4 of the EU AI Act, now in force since 2 February 2025, requires all organisations that provide or use AI systems - including general purpose AI systems such as chatbots - to take measures to ensure the AI literacy of their staff and any other persons dealing with AI systems. This includes employees, contractors and service providers.

This update summarises the current position on AI literacy under Article 4 of the EU AI Act, provides practical approaches to compliance and outlines the evolving support landscape, drawing on recent guidance from the European Commission's AI Office.

What is AI Literacy?

AI literacy is defined as the skills, knowledge and understanding necessary to make informed decisions when using AI systems, including the ability to recognise both opportunities and risks. The required level of literacy will vary depending on the individual's role, technical background and the context in which the AI system is used.

No "One Size Fits All" or Certification

Organisations are expected to make a good faith, context-sensitive assessment of their AI literacy needs and implement appropriate measures "to their best extent".

The European Commission's AI Office has emphasised the need for a flexible, context-dependent approach to AI literacy, recognising that the rapid evolution of AI technologies and

the diversity of organisational needs makes a "one size fits all" approach impractical.

The AI Office has published a repository of AI literacy practices featuring examples from organisations of varying sizes and sectors¹. This repository is intended to foster the exchange of ideas and promote learning about AI literacy practices rather than as a compliance guarantee through the replication of practices listed within it.

There is no requirement for formal certification of AI literacy under Article 4, nor are there any approved certifications at present.

Implementation: Industry Perspective

Industry representatives have reported a variety of approaches to AI literacy, with most organisations adopting multi-tiered strategies. Typically, these involve foundational training for all employees, alongside more advanced programmes tailored for technical specialists, professionals and decision-makers.

The effectiveness of these initiatives is assessed using both qualitative measures such as employee satisfaction and the integration of AI into daily workflows and quantitative key performance indicators (KPIs), including participation rates and competence assessments.

For instance, a leading global insurance and asset management company has implemented a comprehensive upskilling and reskilling

¹ <https://digital-strategy.ec.europa.eu/en/library/living-repository-foster-learning-and-exchange-ai-literacy>

programme, which comprises two main components:

- **Global E-Learning Platform:** This platform offers an extensive portfolio of training sessions, structured according to the technical complexity of the content and the degree of employee involvement with AI systems. Foundational courses are available to all staff, equipping them with essential AI knowledge and skills. More advanced and specialised courses are provided for those directly engaged in the development or maintenance of AI systems, enabling deeper technical expertise;
- **Internal Academies for Specific Roles:** Dedicated academies have been established for key roles such as Data Scientists, AI Business Translators, Smart Automation Experts, Actuaries, Accountants and CRM Experts. These academies either introduce new AI-related roles or enhance existing roles with specific AI competencies, supporting the responsible and effective development of AI systems. The curriculum is tailored to the sector, featuring real-world examples and case studies of AI applications developed or utilised within the organisation.

The impact of this programme is closely monitored through a range of KPIs, including the number of employees participating in training, course completion rates, skills development outcomes, participant satisfaction and the proportion of employees who have experienced a change or progression in their roles following completion of the training.

Practical Guidance for Organisations

Below are some practical suggestions to help organisations meet their AI literacy obligations:

- **Assess Current Literacy Levels:** Review the current level of AI knowledge in your organisation, using surveys or other tools to identify gaps among staff involved in AI development or deployment;
- **Tailor Training to Roles and Risks:** Decide who needs advanced technical training and who only needs a general overview, based on the types of AI systems in use and the roles of affected individuals;
- **Keep Training Materials Up to Date:** Ensure training materials are regularly updated as AI evolves. Formats may include workshops, game-based approaches or real-case scenarios;
- **Document Training Activities:** While not mandatory, documenting training activities and literacy measures is recommended as good practice, particularly for demonstrating compliance in the event of an incident or inquiry; and
- **AI Office Updates:** Monitor updates from the AI Office, including new practices added to the AI literacy repository and further guidance as enforcement mechanisms are established.

Enforcement

The obligation to comply with Article 4 is already in force. However, public enforcement by national market authorities is not scheduled to begin until August 2026. Member States are required to establish rules regarding penalties, which may include empowering national authorities to impose sanctions for breaches of Article 4.

To date, the Irish Government has not published any legislation concerning penalties under the AI Act. In the interim, until national authorities commence enforcement of AI literacy obligations, the only available avenue for addressing breaches of Article 4 is through private enforcement, such as complaints made by affected individuals.

The Government has approved the designation of an initial list of eight public bodies as competent authorities responsible for implementing and enforcing the AI Act within their respective sectors. These authorities are:

the Central Bank of Ireland, Commission for Communications Regulation, Commission for Railway Regulation, Competition and Consumer Protection Commission, Data Protection Commission, Health and Safety Authority, Health Products Regulatory Authority and the Marine Survey Office of the Department of Transport.

The Government will designate additional authorities, as well as a lead regulator who will coordinate enforcement of the Act and provide a range of centralised functions.

For more on our AI updates, please visit our AI Advisory webpage².

If you would like to discuss the topics considered here or require any further information, please liaise with your usual Maples Group contact or any of the persons listed below.

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² [AI Advisory at the Maples Group
maples.com](https://www.maples.com)