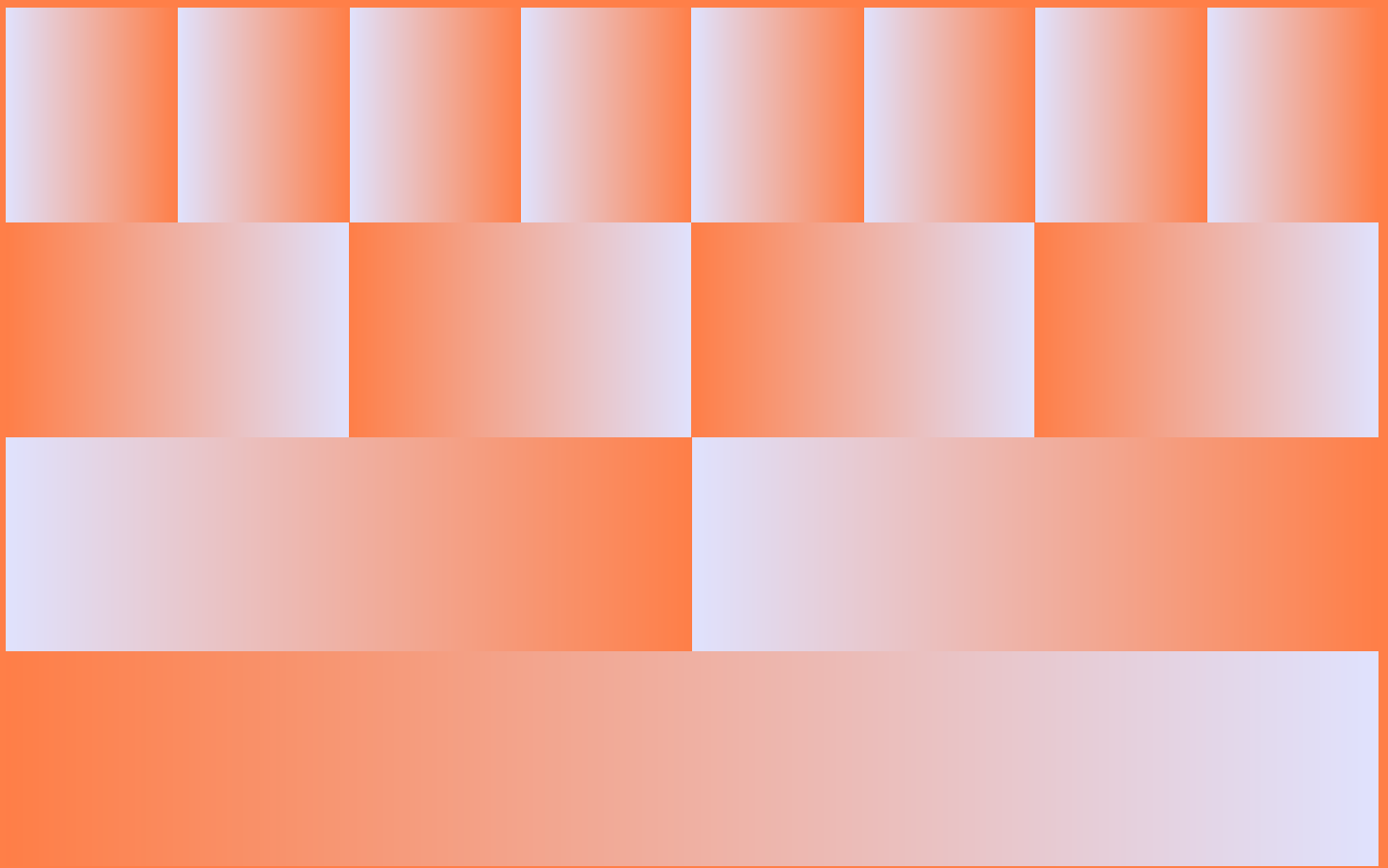




POLICY BRIEF

An operational framework for AI literacy in the workplace

Informing action plans under the EU AI Act

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Executive summary

Organisations in the European Union (EU) face a new legal obligation. Since February 2025, the AI Act has required providers and deployers of Artificial Intelligence (AI) systems to ensure “a sufficient level of AI literacy” among staff. However, the Act does not specify what constitutes AI literacy beyond “skills, knowledge, and understanding,” nor does it clarify what is considered sufficient. While many employers do offer training to keep pace with the latest developments in AI, these trainings tend to focus primarily on productivity, which is not necessarily aligned with the risk mitigation priorities of the European legislation. This mismatch in objectives could be resulting in inadequately trained staff operating consequential AI systems, as nearly a quarter of European workers are already using AI technologies for work tasks (European Commission, 2026b). Further, there is no published evidence that any AI literacy program, public or private, does what Article 4 of the AI Act requires.

It would be remiss to say that nothing has been done to define AI literacy in the EU. The tangible gap, however, is in operationalising the many definitions through a coherent framework. The EU now has rich content instruments: DigComp 3.0, an EU-wide framework for digital competencies, integrates AI across all of its competences, and the Commission, together with the OECD, finalised their AILit framework for schools in June 2026. These instruments define what workers should generally know about AI. We argue, however, that this is not sufficient. The depth of this knowledge should depend on the specific role and tasks of the worker, and there needs to be a way to measure it. Therefore, this brief takes these definitions a step further and proposes a role-specific AI literacy framework, based on the level of interaction the worker’s job has with AI.

This framework is keyed to how much and how consequentially the workers interact with AI. Instead of looking at peoples’ job titles, seniority or technical background, the framework proposes the following three tiers:

TIER	POPULATION	REQUIRED UNDERSTANDING	MEASUREMENT
L0 Baseline	Everyone working under the organization's remit: staff, plus contractors and service providers	What AI is and is not, using the Act's own definition (Article 3(1)); which systems the organisation uses; generic risks such as fabricated output, bias and data exposure. Corresponds to Basic-level, AI-explicit competences in DigComp 3.0 (evaluating information, personal data and privacy).	Record of awareness training or equivalent measures
L1 Operational	For workers who are required to	Capabilities, limits and failure modes of the systems they use; how to interpret and verify outputs; effective prompting and querying;	System-specific training records plus a written

	use AI systems in their role	disclosure and copyright duties; when to escalate; relevant legal and ethical obligations.	rationale linking training to roles and risks
L2 Oversight	Persons assigned to operate or oversee high-risk AI systems	Deep system-specific competence: monitoring, recognizing malfunction and drift, detecting bias, knowing when and how to intervene or override, and distinguishing high-risk from prohibited uses.	Documented competence assessment and oversight assignment, reviewed at least annually or when the system changes

Table 1. The tiers in operational terms. Tiers are cumulative.

This framework can be applied across sectors and accommodate the diversity of individuals and roles that now interact with AI technologies daily. It can help compare programs across borders, and provide smaller firms a baseline to build on. A common framework and understanding of AI literacy will also support workforce development and mobility: employees could carry these recognized competences between employers and build on them in different roles, while employers would have a shared scale to develop them. We recommend not introducing a certification for AI literacy yet, and instead focus on creating a validated measurement first, as a certification introduced at this stage could run the risk of becoming a box-ticking exercise and encouraging untested courses.

Defining the scope and requirements of the AI literacy duty

The European Union is the first jurisdiction to introduce a comprehensive, economy-wide duty of AI literacy for organisations that develop and deploy artificial intelligence. In contrast, other regions have implemented only sector-specific training requirements, lacking obligations of similar breadth. Beginning in February 2025, the AI Act requires organisations providing or deploying AI systems to implement measures that ensure, “to their best extent, a sufficient level of AI literacy” among staff and individuals operating AI on their behalf, taking into account existing knowledge and the context of use (Regulation (EU) 2024/1689, Article 4).

AI literacy is defined as the “skills, knowledge and understanding” necessary for individuals to deploy AI in an informed manner and to recognise its opportunities, risks, and potential harms (Article 3(56)). The Act does not specify what constitutes sufficiency, and the European Commission has opted not to provide a more specific definition for AI literacy, creating operational ambiguity. Instead, the Commission's guidance encourages organisations to promote a general understanding of AI, without

prescribing a specific curriculum, assessment, or certification (European Commission, 2025a).

Despite attempts to address Article 4's language, challenges remain in how organizations can interpret and operationalize AI literacy efforts. The provisional AI Omnibus agreement of May 2026 (European Commission, 2026a) proposes to soften the duty, shifting from ensuring a sufficient level of literacy to taking “measures to support the development of” literacy. This adjustment aims to accommodate smaller firms that view a uniform standard as disproportionate. Although this change reduces legal exposure, it does not resolve the underlying challenge implicit to the vague language of the article, which leaves ‘AI literacy’ insufficiently defined in an operational context. Additionally, organizations deploying high-risk systems remain obligated to train staff who operate these systems and to maintain human oversight. Liability persists if incidents are linked to untrained personnel (European Commission, 2025a).

Adoption of AI systems has already outpaced regulatory obligations, with a European Commission ECFIN Business and Consumer Survey finding nearly a quarter of European workers use AI technologies for work tasks (European Commission, 2026b), potentially resulting in untrained staff operating consequential systems. At this scale of adoption, it is reasonable to assume that not all workers are adequately prepared to operate consequential AI systems. The costs of errors, including liability and reputational damage, can accrue to organisations well before regulatory intervention. Beyond avoiding these costs, a workforce that understands the limitations and potential failures of AI models is better equipped to identify impactful and appropriate use cases and proactively avoid potential misuse.

The agreed AI Act text frames AI literacy as a strategic priority, and this rationale remains valid regardless of the duty's final form. For these reasons, the case for building AI literacy remains compelling even under a less stringent legal duty. Ultimately, organisations must still determine the necessary level of understanding for relevant personnel and be able to demonstrate compliance.

International approaches to AI literacy initiatives

Other governments' approaches range from creating tailored education programs and initiatives starting as early as primary school, to private partnerships to train relevant people in the workforce. There has been little focus on defining AI literacy as a concept, and more on preparing people, young and old, for AI adoption.

The United States issued an executive order to “promote AI literacy and proficiency” through schooling, teacher training, and apprenticeships. This pipeline approach develops

AI skills from education to early career stages but does not require employers to participate (The White House, 2025). American corporate practice takes a narrower line: the NIST framework never uses the term “AI literacy” at all, asking only that personnel receive risk training relevant to their duties (NIST, 2023).

The United Kingdom combined its AI Opportunities Action Plan with partnerships involving Google, Microsoft, and IBM to train 10 million workers by 2030, a target raised from 7.5 million when the programme expanded in January 2026. It also introduced the Skills England benchmark to specify training content, and built the delivery to match: the free AI Skills Hub hosts short, industry-developed courses assessed against that benchmark, and those who complete them earn a government-backed digital badge that signals their competence to any employer (UK Government, 2026; Skills England, 2026; AI Skills Hub, n.d.).

China has taken the most directive approach. In May 2025, its Ministry of Education required schools to integrate AI instruction into primary and secondary education as a tiered, progressive system. From the autumn term, cities began making these courses compulsory, with Beijing alone enrolling about 1.8 million pupils (Ministry of Education of China, 2025).

We see a pattern emerging around different approaches to AI literacy. Some governments are focussing on mass courses and citizen wide educational programs to form a baseline, while others are partnering with industry to benchmark training content. The EU, however, remains the only region with binding AI literacy duties, and has not produced any practical guidance on requirements from organisations. The European Commission and OECD AILit framework define AI literacy for students and teachers in school education rather than the general workforce (UNESCO, 2024; European Commission and OECD, 2025).

Corporate adoption outpaces evidence-based guidance

It is unsurprising that organisations are adopting AI, and workers are already interacting with the technology in their daily jobs. A recent Eurostat study found that 20% of EU enterprises with 10 or more employees used AI in 2025, which is a big jump from 13.5% in 2024. Bigger still, this adoption is at 55% among large enterprises. A 2026 Microsoft survey of over 20,000 knowledge workers that use AI across 10 markets showed that 58% are now producing work they couldn't without the technology. The World Economic Forum's 2025 employer survey reports that 77% of firms plan to reskill or upskill staff to work alongside AI, and ranks AI and big data among the fastest-growing skill areas worldwide (World Economic Forum, 2025).

Across the Union, the AI adoption is quite uneven. It ranges from as high as 42% in Denmark to as low as 5.2% in Romania (Eurostat, 2025). The Article 4 obligations, thus, hit organisations and regions at very different levels of institutional maturity. The European Union's repository of literacy practices finds organisations of every size already running training programmes that separate developers, administrators, and legal staff (European Commission, 2025b), showing that organisations are improvising in absence of a common framework.

No evidence yet shows that these trainings work, and three gaps might explain the reason. The first is **motive**. Corporate training aims at productivity and teaches people to use the tools well, whereas the law cares whether operators understand how systems fail and cause harm. A workforce fluent in prompting can still be illiterate in the sense a regulator means: trained to produce good output, but not to recognise when a model misleads or to know its duties under data-protection and risk rules. The second is **quality**. Training is unaccredited by design, since the Commission requires no certificate and does not treat completion of any course as evidence of compliance. The resulting market has no quality floor, but does have every incentive to sell courses that look compliant without testing whether anyone has learned anything. The third is **measurement**. The most recent systematic review found that the validated instruments were built for students and general populations, that few were tested beyond basic validity, and that none were tested across cultures (Lintner, 2024). In the end, no published evidence shows that any AI literacy programme, corporate or public, does what Article 4 calls for.

These gaps point to the need for a standardised approach, understood as a shared method. It would rest on a common tier logic for deciding what training each role requires, a European benchmark setting out the content of each tier, and an agreed method for testing whether training actually improves understanding. Such a framework would let programmes be compared across borders and supply chains and would give smaller firms a baseline to build on.

A common vocabulary for literacy would also support workforce development and mobility, since employees could carry recognised competence between employers and across jurisdictions while employers gained a shared scale to develop it. It would give buyers of training a way to judge providers and set a quality floor without the need for certificates.

Indeed, certification can, and should, wait. With no validated way to measure learning, a certificate awarded now would only formalise the box-ticking the market already rewards, lending the look of rigour to untested courses.

A three-tier framework for AI literacy

Operationalising the concept of “sufficient” AI literacy requires calibrating literacy requirements according to individuals’ specific interactions with AI and the associated risk, rather than applying a universal standard. A similar challenge was previously present in the broader AI talent discourse: until recently, “AI talent” was considered a single, undifferentiated category, resulting in analyses that were too broad to inform policy or practice. Splitting the pool into tiers by technical depth, from non-technical roles requiring AI familiarity to software development, to deep learning specialisation, made national AI workforces measurable and comparable across 31 countries (Pal, Schneider and Lazzaroni, 2025).

A similar tiered approach is necessary for AI literacy, as a blanket definition is neither required nor sufficient for all individuals interacting with AI. Currently, the term “AI literacy” applies to a wide range of individuals, from a schoolchild learning about algorithms to an accountant using a chatbot and an operator overseeing a credit-scoring model. While no single definition adequately captures all these cases, a tiered framework can accommodate this diversity.

The proposed framework assigns AI literacy requirements according to professional roles, enabling individuals to transition between tiers as their responsibilities change. Its structure corresponds to variables identified, though not explicitly defined, in relevant legislation: the individuals interacting with AI systems, the depth of their interaction, and the associated risk level of both the system and the type of interaction.

These variables correspond to three tiers: a baseline applicable to all members of the organisation, an operational tier for users of specific systems, and an oversight tier for those managing high-risk systems. This approach creates space for roles and responsibilities to shift over time, and workers to move tiers as technology develops and reshapes organisations and broader legal requirements across Europe. These tiers are also cumulative.

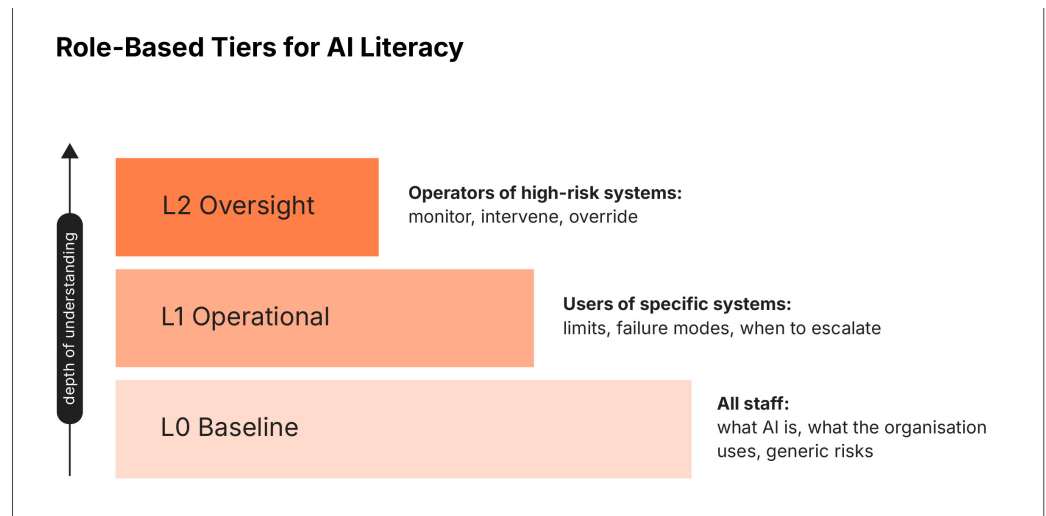


Figure 1. Three cumulative tiers of AI literacy. An individual's tier follows their role, not their seniority or technical background.

This figure describes the depth of knowledge needed by different workers in an organisation based on their level and scope of interaction with AI. Another dimension to this framework is the content of the knowledge needed at each of the tiers. This can be supplied by existing EU instruments that define AI literacy: DigComp 3.0's 21 competences across five areas, now with AI integrated transversally and each statement labelled AI-explicit or AI-implicit (Cosgrove and Cachia, 2025); and the four domains of the OECD and Commission AILit framework (OECD and European Union, 2026).

Grounding each tier in established instruments

In order to guarantee that the tiered literacy framework is operational at both an organisational and institutional level, it is also crucial to ground each tier with established guidance and regulations from across Europe. Not only does this ensure legal compliance, but it also creates better cohesion between EU institutions and member states to ensure a more unified understanding and implementation of AI literacy frameworks.

L0 corresponds to the general understanding mandated by the Commission's guidance for all organisations (European Commission, 2025a) and aligns with Finland's Elements of AI course. This free programme, launched in 2018 to teach foundational AI concepts, is offered across the EU with the objective of reaching 1% of citizens and has been completed by over a million learners worldwide (Elements of AI, n.d.; Finnish Government, 2019).

L1 integrates measures specified by the Commission's guidance for particular roles and risk profiles, as well as workplace AI skills standards emerging in national programmes, most notably the UK's Skills England benchmark. This benchmark defines foundational

skills for workplace AI use across three domains: technical, non-technical, and responsible or ethical (Skills England, 2026). It draws on Skills England's analysis of AI skill needs across ten growth sectors, which also gives employers a wider framework and worked use cases for applying the skills (Skills England, 2025).

In contrast to the other tiers, **L2** is grounded in binding legislation rather than guidance. For high-risk AI systems, such as those used in hiring or credit scoring, the Act mandates that operators receive training and that human oversight remains possible. The 2026 amendment, which relaxed the general literacy requirement, did not alter these high-risk obligations (European Commission, 2025a).

A transparency-only system, such as a chatbot or content generator, is classified at L1 when it becomes integral to an individual's job responsibilities; incidental use remains at the L0 baseline. Understanding that outputs are fallible and subject to hallucinations is inherent to the L0 baseline, as is a familiarity with ethics and appropriate use cases, both generalised and firm-specific. The use or procurement of tools that are deemed high-risk by the AI Act, like biometric classification systems or predictive policing, are classified at L2, as each requires human oversight and operators. This approach aligns with the Act's proportionality test regarding context of use and introduces documented training only when a system is substantively relied upon for legitimate and proportional objectives.

Policy recommendations

For organisations, this paper's proposed framework turns the duty into a structured 5-step process: inventory the AI systems in and the people who interact with them; assign each person to a tier, train them to that tier; record what was done and why; and review when systems or roles change, and annually for L2. Deployers of high-risk systems should build their Level 2 (L2) training alongside their human-oversight arrangements, since the two obligations are linked and both remain in force under the amended law. Organisations that are buying training can also use these tiers as a procurement criteria.

For policymakers, the proposal is to adapt the frameworks that already work. Two of the three pieces already exist: a tiered grid that employers can apply, and a baseline tier that stays free to everyone, as Finland's course has shown. The third, a validated way to measure whether training improves understanding, does not yet exist. It should be built deliberately rather than left to the market. Governments should commission it with industry, training providers and research bodies, and coordinate timelines across Member States, including which national body owns AI literacy.

Most of the building blocks are already in place: the Act anticipates voluntary codes of conduct to carry such measures (Regulation (EU) 2024/1689, Recital 20 and Article 95); Skills England shows that a government benchmark can work; and ISO/IEC 42001

establishes the practice of recording personnel competence, which supplies the evidence each tier needs (ISO/IEC, 2023). EU research programmes and national skills bodies could build on these foundations by developing a validated approach for measuring and evaluating AI literacy, determining how and where training improves understanding.

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