

Building AI literacy

A prerequisite for responsible AI

October 2025

Organisations providing or deploying AI systems are required to ensure AI literacy among staff and people using AI systems on their behalf. AI literacy requires a continuous effort and a structural approach. This considers the context and roles in which people work or interact with AI systems. In addition to the legal obligation, AI literacy is a prerequisite for responsible AI and algorithms. It enables organisations to make the most of innovative technology, properly assess the impact of a system and adequately mitigate risks. In this second guide, the Autoriteit Persoonsgegevens (AP), the Dutch data protection authority, explains more about the steps that organisations can take to ensure sufficient AI literacy.

About this document

This document is a follow up to the AP's guide *Get Started with AI literacy*. The AP gained the insights for this second guide through [a call for input](#) (April 2025) and the seminar *Working together on AI literacy* (June 2025).

The AP has previously published:

- [Getting Started with AI Literacy](#)
- [First results Call for input](#)

Organisations that develop or use AI must proactively engage with AI literacy. The developments in the field of AI are evolving rapidly and the possibilities seem endless. Results from a call for input from the AP shows that the approach to AI literacy is developing less rapidly. The AP stresses that the increasing use of AI also requires an increasing commitment for AI literacy. This enables organisations to work responsibly and innovatively with AI, while meeting the obligations of the AI Act.

1. What is AI literacy?

The AI Act requires all organisations providing or deploying AI to take measures to ensure sufficient AI literacy among persons involved in the operation or deployment of an AI system. This means that those individuals have the right skills, knowledge and understanding to deploy AI systems responsibly. This enables organisations to get the most benefits from AI systems, while preserving fundamental rights and values.

AI literacy encompasses the knowledge, skills and understanding of responsible application, interpretation of results and impact on people. This is important for everyone in the AI value chain. The European Commission has recently provided additional guidance on the interpretation of AI literacy.

Clarification of AI literacy

The European Commission has provided a Q&A on AI literacy since mid-2025, which is periodically updated.

It explains what is meant by AI literacy and what is important to comply the legal obligation.

A number of basic factors must be part of every AI literacy program. Within the organisation, it should be clear which AI systems are being developed or used. The organisation's role (e.g. provider or deployer) in relation to the AI system is also important. In addition, there should be an understanding of the potential risks of the AI systems the organisation engages with. Individuals involved should possess the appropriate knowledge to identify and mitigate the risks. Ensure that the chosen approach aligns with the existing knowledge and the experience of those involved.

It is important that AI literacy applies not only to an organisation's own staff, but also to people deploying AI systems on behalf of an organisation. Consider, for example, the staff of a contractor, service provider or client. When using AI, AI literacy is a prerequisite for making informed decisions. It mitigates potential risks, such as the violation of fundamental values and rights of persons affected by the AI system.

There is no 'one size fits all' set of measures that guarantees an adequate level of AI literacy.

The appropriate measures depend strongly on the context, namely (1) the technical knowledge, experience and training of the those working with the AI systems, (2) the environment in which the AI systems are used and (3) the individuals or groups affected by these AI systems.

To demonstrate AI literacy, it is important to maintain internal documentation on the approach and progress made. In context of enforcing the AI Act, a demonstrable lack of AI literacy may play a role in the assessment of an incident. For instance, insufficient training or guidance for staff or other involved individuals could be the cause of an incident. At the same time, there is no requirement to measure the level per individual, or obtain AI literacy certifications.

These insights were obtained from the European Commission's AI Literacy – Questions & Answers (2025).



2. How to get started?

In January 2025, the AP published a [multi-annual action plan](#) to promote AI literacy (identification, goal setting, implementation and evaluation) (see Annex).

Organisations that develop or use AI systems are best positioned to assess which measures are needed to ensure sufficient scope and depth of AI literacy. The AP's multi-annual action plan can support this process. Using practical insights from the call for input, we further clarify the steps.



Step 1 Identification

Determine needs and challenges

The first step is to understand which AI systems are used within an organisation and to gain insight into the associated risks and opportunities. It is also important to determine which individuals are involved in the deployment and development of AI. The AP expects organisations to have a clear overview of:

- **The AI system.** Make an inventory of all AI systems within the organisation. Consider the degree of autonomy of the system. The greater the degree of autonomy, the more attention is needed for AI literacy by affected individuals. In addition, it is important to be clear about the purpose of the system, and whether this is desirable.
- **The risks of the AI system.** Consider the context or sector in which the system is applied and what impact the AI system can have on fundamental rights, safety and health of people.
- **The level of knowledge of the individuals involved.** The approach of AI literacy varies by role, function and expertise (see step 2). Understand who works with which AI system and what knowledge, skills and understanding they need. In addition, map out the current level of knowledge and skills of involved employees.
- **Opportunities and ambitions in the field of AI.** This contributes to a sustainable action plan for AI literacy.



"Before deploying AI, identify both opportunities and risks. This will enable you to make an informed decision about the stakes involved."



With the growing adoption of AI, organisations are increasingly aware of the urgency for proper governance and control of AI. This is evident from the responses to the AP's Call for Input. For example, in education and services, generative AI is being used more frequently, such as chatbots that automatically generate responses to questions from students or clients. At the same time, there is reluctance, possibly due to a 'fear of losing control': the concern that employees use AI applications without sufficient oversight, frameworks or safeguards. The Call for Input also shows that organisations are often in early stages of developing their approach to AI literacy. The AP underlines that organisations must take responsibility for fostering and maintaining AI literacy.

These insights were obtained from the Call for Input from the AP on AI literacy in April 2025.



Step 2 Goal setting

Establish concrete and measurable targets

The second step is setting and prioritising concrete, measurable goals based on the level of risk. According to the AP, the following aspects must be considered:

- **Prioritise in risks of AI systems.** The higher the risk associated with the AI system, the greater the need to prioritize AI literacy. In addition, the AI Act requires deployers of high-risk AI systems to ensure that workers with expertise oversee such systems. For effective oversight, these individuals must possess appropriate skills and training, and be adequately supported.
- **Identification of required knowledge and skills.** AI literacy demands multidisciplinary knowledge. Individuals in different roles require different knowledge and skills beyond existing expertise. For example, an employee who develops an AI system may possess strong technical capabilities, but may have limited awareness of ethical implications. In addition to function-specific knowledge, AI literacy also requires an organisation-wide understanding. Future initiatives in the field of AI should take into account the organisation as a whole.
- **Determine goals and responsibilities.** Define concrete measures and assign responsibilities in certain functions. Consider establishing a center of expertise or appoint dedicated specialists in the organisation whom employees can consult with questions about AI systems. Promoting a safe and open work culture is essential—one where employees feel encouraged to learn from each other's questions and mistakes.

"Make AI literacy a priority, and make someone in the organisation responsible for the progress on AI literacy."



Differentiation between functions, risk profiles and level of experience helps to clarify the knowledge, experience and understanding of AI expected from individual employees and from the organisation as a whole. The AP notes this based on responses to the Call for Input.

Organisations underline the need to make AI literacy an integral part of defined roles, in decision-making and in existing programmes, such as cybersecurity awareness training or compliance frameworks.

These insights were obtained from the Call for Input from the AP on AI literacy in April 2025.



Step 3 Implementation

Execute strategies and actions

After setting goals, the next step is to determine strategies and actions. The AP expects that the following will be taken into account:

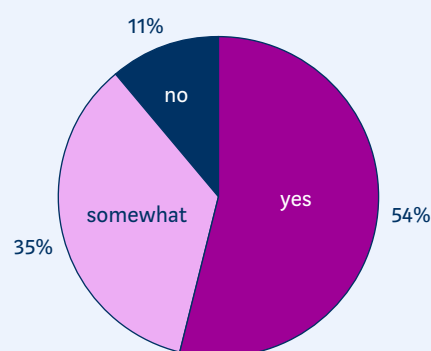
- **Agenda-setting at management levels.** For a sustainable approach, board members need to understand the importance of AI literacy, embedding it and budgeting. In doing so, it is important that board members themselves also have sufficient knowledge about the functioning, risks and opportunities of AI. As a rule, an AI literacy approach should not stand alone, but should be integrated into an AI strategy or vision.
- **Training and awareness.** The goals set out in step 2 call for initiatives such as training and awareness programmes. Awareness-raising about the consequences of the deployment and development of AI can help as a basis for increasing the knowledge and skills of employees and other people involved.
- **Transparency about the use of AI.** Ensure transparency within the organisation and outwardly about the use of AI systems and algorithms. This way, employees and people involved can also be critical and proactive.
- **Monitoring.** In order to demonstrate AI literacy, it is important to keep internal documentation on the approach and progress.

“Ensure the involvement of different departments across the organisation. For example, through a horizontal working group on AI literacy.”



Organisations indicate that AI literacy is often approached 'bottom-up'. The AP emphasises that top-down management guidance and involvement of management is also important. For example, an individual employee sees the importance of AI literacy, delves into the subject and brings it to the attention of colleagues or management on their own initiative. This is a valuable starting point. But for a sustainable embedding, management plays an important role in maintaining the attention and attitude towards AI within the organisation. See Figure 1 for the results from the call for input, where the AP assumes that organisations responding to the call are in many cases the frontrunners in a positive sense.

FIGURE 1 | Is AI literacy currently on the agenda at the administrative levels?



These insights were obtained from the Call for Input from the AP on AI literacy in April 2025.



Step 4 Evaluation

Review results and identify areas of improvement

Due to the rapid developments and applications of AI, AI literacy is not an end goal, but a constant process.

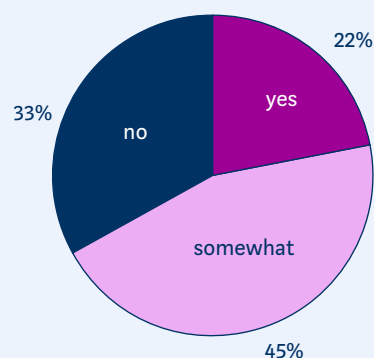
A structural evaluation of AI literacy requires:

- **Monitoring and a regular analysis whether the target is being met.** The results show whether the current measures are working or whether adjustments are needed. Make AI literacy part of management reporting.
- **Control of the use of AI systems within the organisation.** As the use of AI within an organisation grows, more AI literacy maturity will also be needed.



The Call for Input shows that continuity and safeguarding AI literacy is an important but challenging task within organisations. A small part of organisations monitor the development and progress of AI literacy within the organisation. Measuring impact and level of knowledge is still under development. Organisations are currently experimenting with baseline measurements and evaluation formats.

FIGURE 2 | Is AI literacy currently being monitored within the organisation?



These insights were obtained from the Call for Input from the AP on AI literacy in April 2025.

3. The AP and AI literacy

The AP is coordinating supervisor of algorithms and AI and contributes to the (preparation of) supervision of the AI Act. The policy, best practices and guidelines on AI literacy are still under development and the AP is also contributing to this. In addition, the AP gives direction to the responsible use of algorithms and AI in a broad sense, even if algorithmic processes or systems are not covered by the AI Act. A key requirement for the responsible use of algorithms is insight in the opportunities and impact of such systems. AI literacy applies not only to high-risk systems but to all AI systems.

The AP sees AI literacy as a focus area. In the coming months, the AP will further explore the state of affairs in the field of AI literacy. In 2026, the AP will conduct a targeted survey among Dutch organisations to monitor progress of AI literacy. Additionally, the AP will organise a second seminar on AI literacy, providing a platform for organisations to exchange knowledge.

