

Does your training plan comply with the EU AI Act?

How to prepare your organisation to respond to the new AI regulation



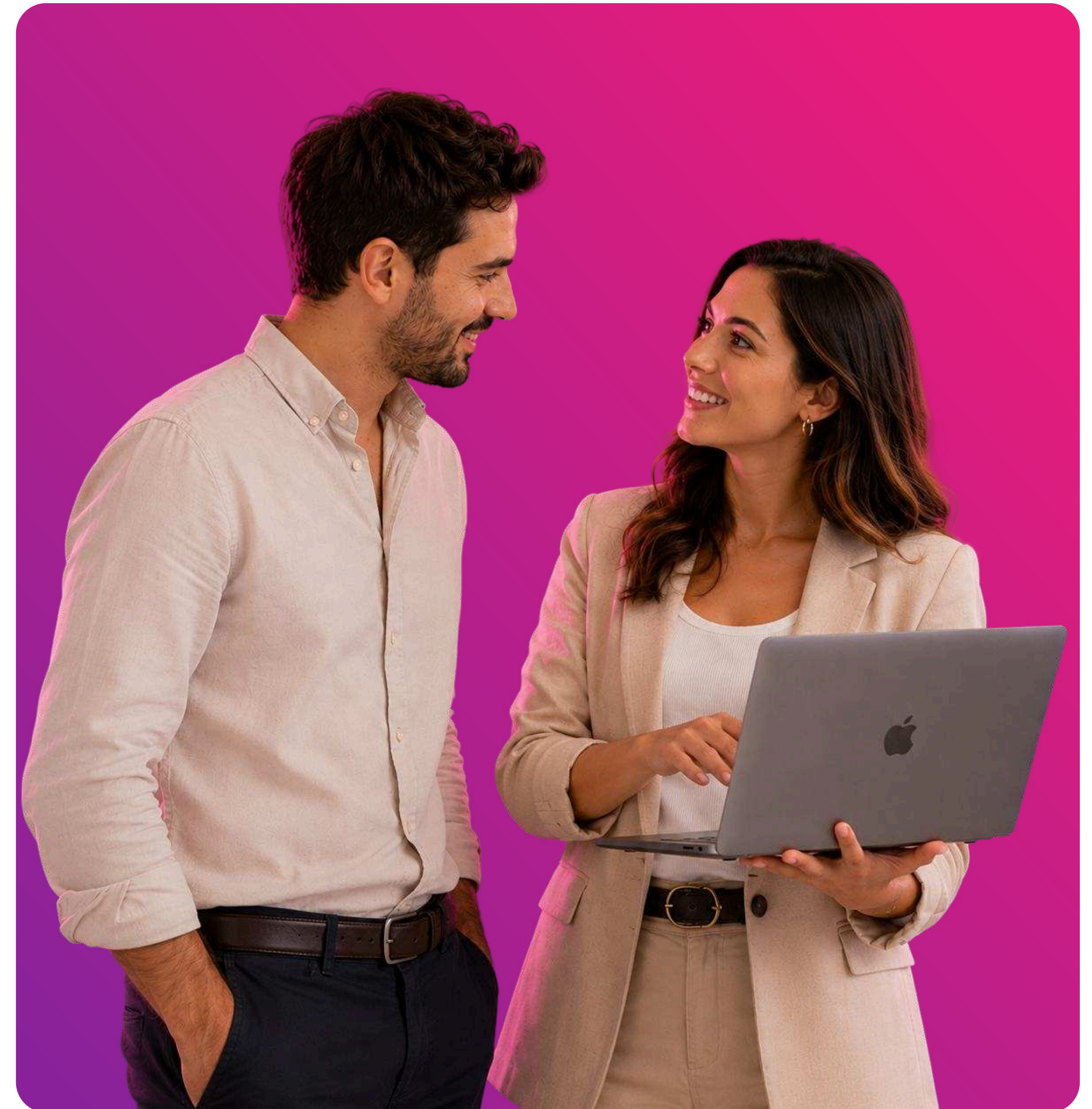
**EU Artificial
Intelligence Act**

AI



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The AI Act is also a learning and development issue

Artificial intelligence is already part of everyday work. It is used to create content, summarise information, analyse data, automate processes, answer questions, and support decision-making. And as organisations adopt it, a question is emerging that goes far beyond choosing which tools to use: **are people prepared to use them properly?**

The **EU AI Act** places this question in a new context. The regulation not only regulates certain artificial intelligence systems according to the risk they may pose. It also establishes obligations related to the **AI literacy of the people who work with these systems.**

Article 4 of the AI Act started applying on **2 February 2025**, and since August 2026, authorities have been able to supervise its application.

For Human Resources and Learning & Development teams, this creates a new challenge: **moving beyond simply teaching people how to use AI tools and towards developing the capabilities they need to use them in an informed, critical, safe, and context-appropriate way.**

But what exactly does the AI Act require? Do all employees need training? What should that training cover? Should someone who uses AI to draft an email receive the same training as someone who uses a system to assess candidates?

This guide will help you answer these questions and turn AI literacy into an action plan for your organisation.



The EU AI Act in 5 minutes

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The EU AI Act in 5 minutes

The EU AI Act establishes a common framework for regulating artificial intelligence in the European Union.

Its approach is based on the **level of risk associated with different uses of AI**. It therefore distinguishes between prohibited practices, high-risk systems, uses subject to certain transparency obligations, and systems posing minimal or no risk.

This means that **not every use of AI involves the same obligations**.

1.1. What does an L&D leader need to know?

Fundamentally, three things:

1 AI literacy is now part of the regulation.

Article 4 states that providers and deployers of AI systems must take measures to support the development of AI literacy among the people who operate or use these systems on their behalf.

2 There is no single training approach that works for everyone.

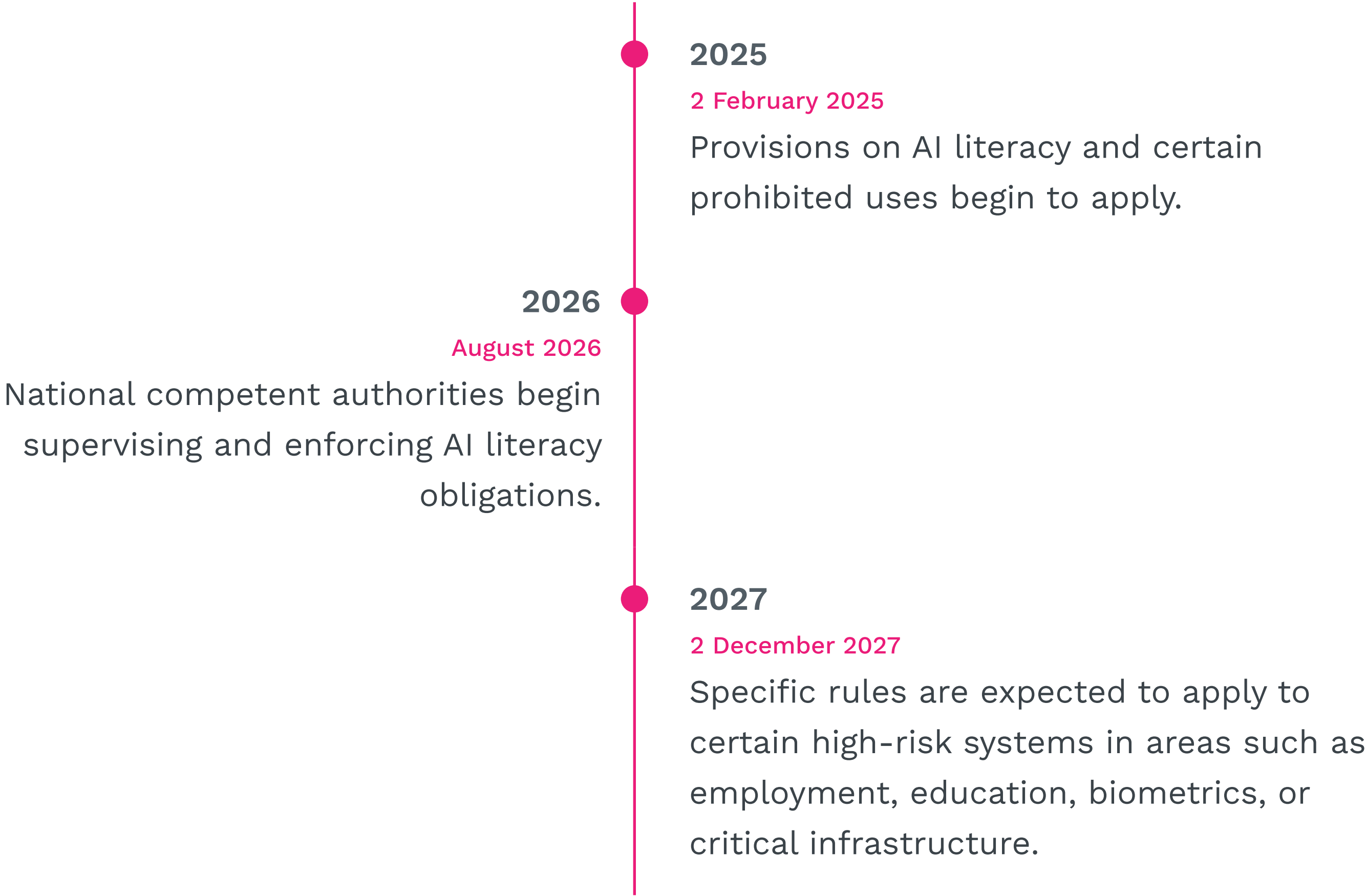
The measures should take into account factors such as people's technical knowledge, experience, and previous training, as well as the context and purpose for which AI is used.

3 The greater a system's impact, the greater the level of attention required

The AI Act's risk-based approach itself requires particular attention to systems whose use may have significant consequences for people.

For high-risk systems, there are also specific requirements related to the training of the people responsible for using them and ensuring effective human oversight.

1.2. Dates L&D should not overlook



So the question for L&D is no longer simply “**should we teach people about AI?**” but rather: **Do we have a strategy for developing the capabilities needed by the people who use AI in our organisation?**

The key for L&D: AI literacy

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The key for L&D: AI literacy

One of the central concepts for HR and L&D is **AI literacy**.

It does not mean knowing how to program artificial intelligence models. Nor does it simply mean knowing how to write good prompts. The AI Act links AI literacy to **having the skills, knowledge, and understanding needed to use AI systems in an informed way and understand their opportunities, risks, and potential consequences**. The Commission also states that organisations should consider what AI they use, what it is used for, what risks it presents, and what each group working with it needs to know.



We can translate this into six capabilities:



Understand

Understand what AI is, which systems the organisation uses and, at a level appropriate to the role, how they work.



Use

Know how to interact with the tools properly and make effective use of their capabilities in a professional context.



Evaluate

Be able to question and verify their outputs, recognising that an AI system can generate incorrect, incomplete, or biased responses.



Protect

Know what information can be entered, what the organisation’s internal policies are, and what risks exist in relation to privacy, intellectual property, confidentiality, or security.



Oversee

Understand when a decision requires human intervention and avoid automatically delegating professional judgement to an AI system.



Act

Know what to do when an incorrect output, potential risk, improper use, or AI-related incident is identified.

The Commission expressly includes, as part of the preliminary analysis for an AI literacy initiative, a general understanding of AI, the systems used by the organisation, their opportunities and risks, the company’s role as a provider or deployer, and the specific characteristics of the context in which AI is used. It also recommends incorporating legal, ethical, and governance aspects.

“
AI literacy is not about teaching people to use a tool. It is about teaching them to work with AI using sound judgement.
”

Is AI training mandatory for employees?

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Is AI training mandatory for employees?

3.1. Does the AI Act require an AI course?

It does not establish a mandatory course, minimum duration, or specific format. The Commission expressly states that there is no one-size-fits-all model for AI literacy and that appropriate measures depend on the system, risk, context, and people who will use it. Training can be one of those measures, together with other guidance and capability-building initiatives.

However, in many cases, **simply providing a tool's instructions or asking employees to read them may not be enough.**

3.2. Does the entire workforce need training?

Not necessarily in the same way. Article 4 applies to people involved in the operation or use of AI systems on behalf of the organisation. The Commission clarifies that this may include employees as well as, depending on the circumstances, contractors, service providers, or other people within the organisation's sphere of responsibility.

The relevant question is not simply who works at the company, **but who uses which AI, for what purpose and with what consequences.**

3.3. Does an employee who uses generative AI also need AI literacy?

Yes. When someone uses an AI system on behalf of the organisation, that use should be included in the corresponding AI literacy analysis.

The Commission itself gives a very simple example: if employees use tools such as ChatGPT to draft advertising copy or perform translations, they should be aware of specific risks such as the generation of incorrect information or “hallucinations.”

AI literacy, therefore, is not just a concern for technical teams.





3.4. Do employees' knowledge levels need to be assessed?

Article 4 **does not require an exam or formal measurement of each employee's level of knowledge**, nor does it require organisations to ensure that every individual reaches a specific level of AI literacy. That does not mean assessment is not useful.

From an L&D perspective, an initial assessment can help identify knowledge gaps, segment audiences, and provide much more relevant learning.

3.5. Is certification required?

Article 4 does not require a specific certification. The Commission indicates that organisations may keep **internal records of training and other guidance initiatives carried out**. This leads to a particularly useful principle for L&D: it is not enough to take action. It is also useful to be able to demonstrate what has been done.

**Why not everyone
needs to learn the
same things**

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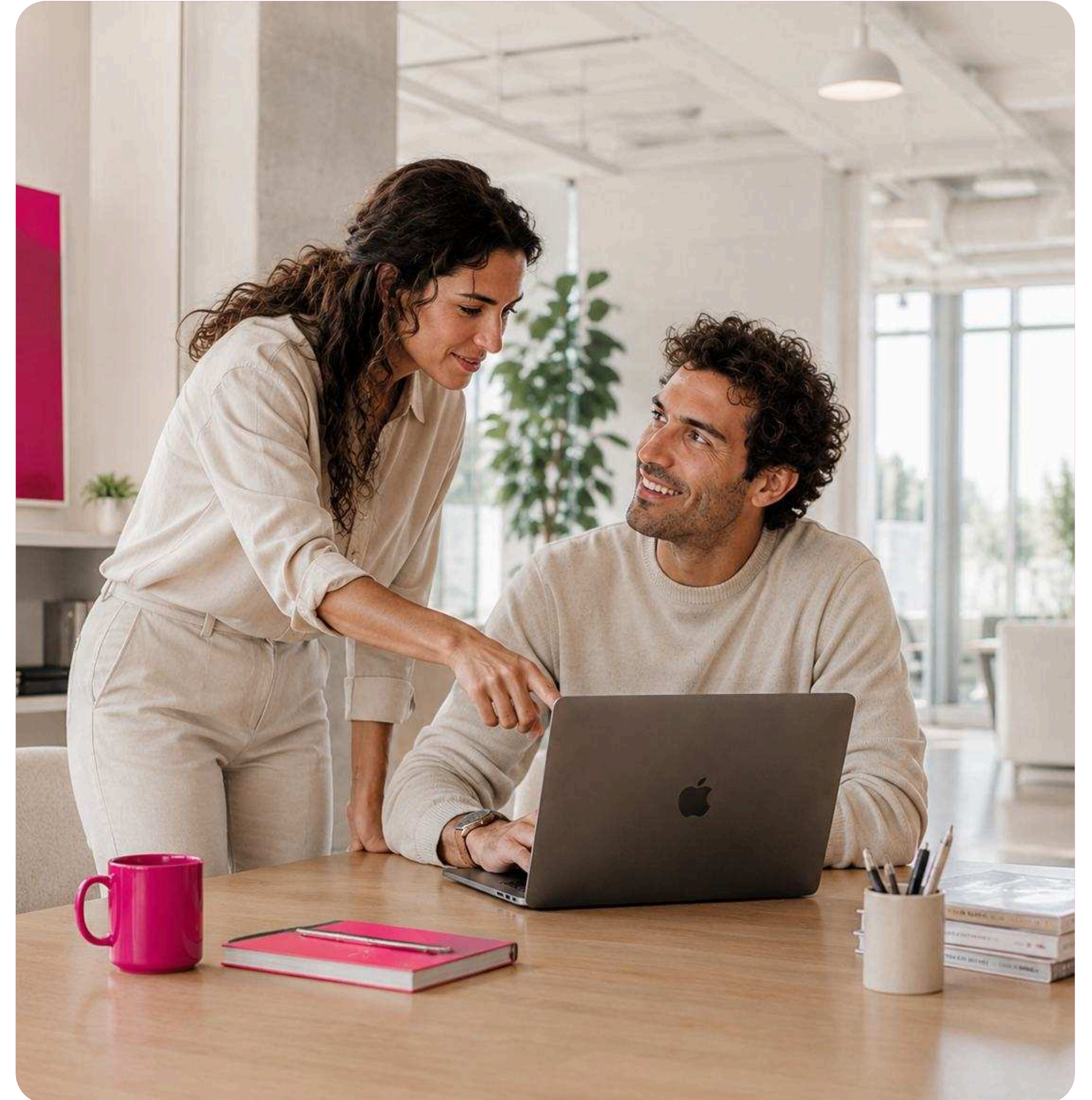
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Why not everyone needs to learn the same things

An easy mistake would be to respond to the AI Act by launching a single course. For example, “**Introduction to Artificial Intelligence.**” It may be a good starting point, but it should not be the end point.

The logic of Article 4 itself calls for considering prior knowledge, experience, training, and the context in which systems are used. The Commission also confirms that different learning levels and approaches may be appropriate for different groups.

An AI literacy strategy should therefore be segmented.



Profile	Main learning needs
Occasional AI users	Basic concepts, risks, output verification, information that must not be shared, and internal policies
Frequent users	Advanced use, critical evaluation, privacy, intellectual property, security, and risks associated with the tools used
Managers	Human oversight, AI-assisted decision-making, bias, accountability, and incident escalation
HR & Talent	Risks associated with decisions about people, recruitment, assessment, promotion, performance, and talent management
L&D	Responsible use of AI in learning content creation, recommendation, personalisation, and assessment
IT / Data / AI	Technical risks, governance, security, operation, and limitations of specific systems
Users of high-risk systems	System-specific training on its limitations, risks, and human oversight mechanisms

These profiles are **not categories established by the AI Act**. They are a practical way to translate its principle of proportionality into learning design.

The right question is not: “Has everyone completed the AI course?” It is: “**Does each person have the knowledge they need to use the AI they work with properly?**”

**What should an AI
literacy programme
include?**

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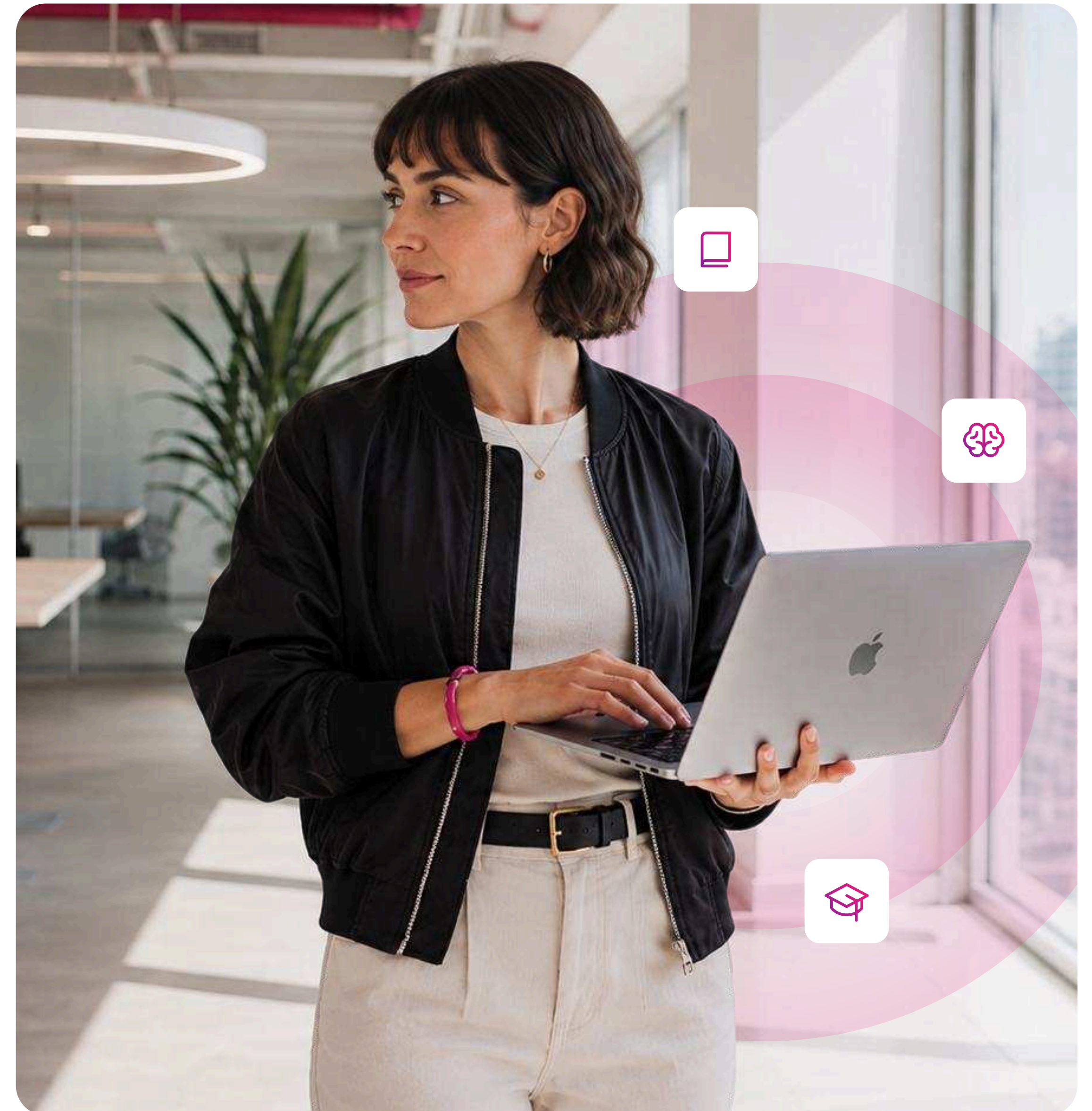
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What should an AI literacy program include?

There is no fixed official curriculum. There is, however, enough guidance to establish the core content of a corporate programme.

The Commission recommends starting with four considerations: ensuring a general understanding of AI, determining the organisation's role, analysing the risks of the systems used, and adapting actions to people's knowledge and the context of use.

From there, an AI literacy programme can be structured around six areas.





Artificial intelligence fundamentals

The goal is not to turn the entire workforce into specialists, but to provide a shared foundation.

For example:

- What we mean by artificial intelligence.
- The difference between AI, generative AI, and other automated systems.
- At a high level, how the systems used by the organisation work.
- What they can do.
- What they cannot do.
- Why their outputs should not automatically be assumed to be correct.



Practical use

AI literacy should connect with real work. Using AI to summarise documentation is not the same as using it to recommend candidates, analyse performance, or support a decision that affects a person.

Training should cover:

- Authorised tools.
- Permitted use cases.
- Restricted use cases.
- Best practices.
- Output validation.
- Situations in which a person must intervene.



Risks and limitations

People need to recognise what can go wrong.

Including:

- Incorrect or fabricated information.
- Incomplete outputs.
- Bias.
- Over-automation.
- Lack of context.
- Improper use of confidential information.
- Privacy risks.
- Security risks.
- Intellectual property issues.

The Commission expressly considers that system risk and the measures to avoid or mitigate it should form part of the AI literacy analysis.



Critical thinking and human oversight

Simply putting a person in the process does not, by itself, guarantee effective oversight.

That person needs to know:

- What to check.
- How to interpret an output.
- What the system's limitations are.
- When to question it.
- When to reject a recommendation.
- When to escalate an incident.

For deployers of high-risk AI systems, the AI Act includes specific obligations to ensure that the people responsible for oversight have the necessary training, competence, and authority.



Regulation, ethics, and governance

Training should align the use of AI with the organisation's rules.
For example:

- Can I enter customer data?
- Can I upload a contract?
- Can I use AI to assess a candidate?
- Can I generate an image using copyrighted material?
- Which tools are authorised?
- What should I do if I identify a discriminatory output?

The Commission recommends integrating legal, ethical, and governance elements into AI literacy initiatives.



Response protocols

“Effective training should not stop at ‘know the risks’. It should also answer the question: **“What do I do when one occurs?”**”

That is why people should be taught where to report incidents, when to request a review, what information should be documented, and who to contact when they have a question. AI literacy thus becomes part of **real AI governance**, not just theoretical knowledge.

Checklist: Is your learning strategy ready?

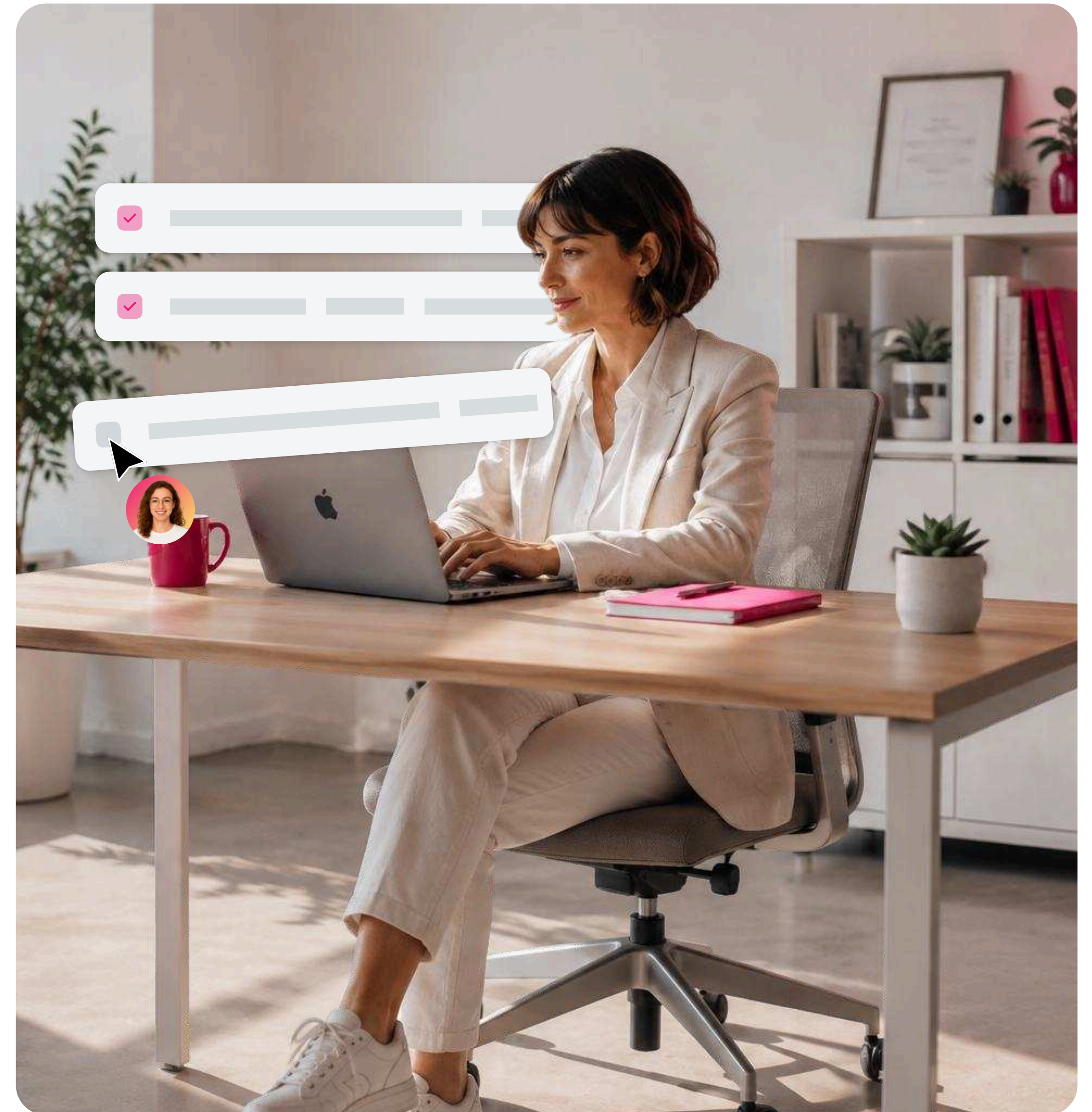
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Checklist: Is your learning strategy ready?

Use this assessment as a starting point.

It does not constitute a legal audit or, by itself, determine compliance with the AI Act. Its purpose is to help you check whether your strategy covers the main elements needed to develop AI literacy across your organisation.



01. Identify

- ☐ We have identified the main AI systems used by our employees.
- ☐ We know which groups use each system and for what purpose.
- ☐ We also account for the use of generative AI tools in everyday work.

02. Segment

- ☐ We have identified different learning needs according to role and use of AI.
- ☐ We take into account each group's prior knowledge and experience.
- ☐ We increase the depth of training as the level of responsibility or risk associated with the use increases.

03. Learn and apply

- ☐ Our employees understand the fundamentals and limitations of AI.
- ☐ They understand the main risks of the tools they use.
- ☐ They know what information they can and cannot share.
- ☐ They know how to verify and question AI-generated outputs.
- ☐ They know the organisations internal policies.
- ☐ Training includes situations and decisions connected to their real work.

04. Maintain and document

- ☐ We can identify which AI literacy initiatives we have carried out and for which groups.
- ☐ We update training when new systems, use cases, or risks emerge.
- ☐ We treat AI literacy as an ongoing process, not a one-off initiative.



What is your level?

0–5 yes answers → Level 1 • Initial

AI adoption may be moving faster than your capability-building strategy.

The first step is to understand which systems are being used, who uses them, and what those people need to know.

6–10 yes answers → Level 2 • Developing

Initiatives are already in place, but there is still room to connect them more effectively to different roles, tools, contexts, and risks.

The next step is to **segment and contextualise**.

11–15 yes answers → Level 3 • Advanced

Your strategy already covers many of the elements needed to develop AI literacy in a structured way.

The challenge now is to keep that knowledge up to date and ensure it evolves at the same pace as the organisation's uses of AI.



**From assessment to
your AI literacy plan**

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From assessment to your AI literacy plan

An effective AI literacy strategy **does not start by creating a course**. It starts by identifying what the organisation needs to learn.

1

Identify: Map the main AI systems and use cases across the organisation. Who uses AI? Which tools? For what tasks?

2

Analyse: Assess the context and the main risks associated with each use. The greater a system's potential impact on people, processes, or decisions, the greater the depth of training should be.

3

Segment: Combine data on people, systems, context, and risk. This will help you move away from a strategy based on:
1 organisation → 1 training approach → 1 level, and towards: 1 organisation → different needs → different learning paths

4

Define: Determine what each group needs to know and be able to do. Not every employee needs the same level of depth in every area.

5

Activate: Combine different types of learning according to the needs of each group:

- Structured training.
- Bite-sized learning and microlearning.
- Practical case studies.
- User guides.
- Reference resources.
- Simulations.

The Commission does not prescribe a single format and specifically emphasises the need to adapt measures to the characteristics of each audience and context.

6

Update and document: AI changes, tools change, use cases change... and risks do too. That is why an AI literacy strategy requires continuous review and a record of the main initiatives carried out.

An AI literacy strategy is not about training everyone in the same way. It is about giving each employee the knowledge they need to use AI with sound judgement in their own work context.



**Turn AI into a real
organisational capability
with isEasy**

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Turn AI into a real organizational capability with isEazy

The AI Act focuses attention on an issue that goes beyond technology: **people need the right knowledge and capabilities to work with AI in an informed, critical, and responsible way.** And that requires much more than a one-off training initiative.

With **isEazy**, you can address the different needs within your AI literacy strategy: from creating and updating content quickly to delivering specialised training, managing your teams' learning, or adapting the experience to different roles and contexts.

Not everyone starts from the same level, uses AI in the same way, or needs to develop the same capabilities.

Move beyond training about AI and truly prepare your organisation to work with it.

Discover isEazy

