30 September 2025

Ministry of Law
Legal Technology Transformation Office
100 High Street, #08-02
The Treasury
Singapore 179434

RE: Comments of ACT | The App Association to the Singapore Ministry of Law on its 2025 Public Consultation on Guide for Using Generative Artificial Intelligence in the Legal Sector

ACT | The App Association (App Association) appreciates the opportunity to submit views to the Ministry of Law (MinLaw) on its draft Guide for Using Generative AI in the Legal Sector (Guide). The App Association commends MinLaw for taking a proactive, risk-based approach to the use of generative AI (GenAI) in the legal sector. AI is an evolving constellation of technologies with incredible potential to improve professional services, but which also raises important questions of safety, confidentiality, and transparency. The Guide's emphasis on professional ethics, confidentiality, and transparency reflects the right starting point.

The App Association represents small business software application development companies and technology firms that create the technologies that drive internet of things (IoT) use cases across consumer and enterprise contexts. Today, the value of the ecosystem the App Association represents—which we call the app economy—is valued at $1.8 trillion and serves as a key driver of the $8 trillion IoT revolution.[1] Alongside the world's rapid embrace of mobile technology, our members create the innovative solutions that power IoT across modalities and segments of the economy.

We respectfully urge MinLaw to incorporate the App Association's AI policy principles into the Guide to ensure alignment with global best practices and to strengthen adoption across practices of all sizes.

1. **Roles and Responsibilities**

The Guide could further clarify the distribution of responsibility across the AI value chain. Our 'Roles and Interdependencies Framework'[2] describes developers, deployers,

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[1] ACT | The App Association, State of the App Economy (2022), https://actonline.org/wpcontent/uploads/APP-Economy-Report-FINAL.pdf.
[2] ACT | The App Association, AI Roles & Interdependency Framework, https://actonline.org/wp-content/uploads/ACT-AI-Roles-Interdependencies-Framework-final-text-May-2024-UK-English.pdf.

and end users, and assigns each appropriate duties in ensuring safe, effective, and transparent outcomes.

2. **Quality Assurance and Oversight**

Policy frameworks should utilise risk-based approaches to ensure that the use of AI aligns with any relevant recognised standards of safety and efficacy. Small software and device companies benefit from understanding the distribution of risk and liability in building, testing, and using AI tools. Policy frameworks addressing liability should ensure the appropriate distribution and mitigation of risk and liability. Specifically, those in the value chain with the ability to minimise risks based on their knowledge and ability to mitigate should have appropriate incentives to do so. Some recommended areas of focus include:

- Ensuring AI is safe and efficacious.
- Encouraging AI developers to consistently utilise rigorous procedures and enabling them to document their methods and results.
- Encouraging those developing, offering, or testing AI systems intended for consumer use to provide truthful and easy-to-understand representations regarding intended use and risks that would be reasonably understood by those intended, as well as expected, to use the AI solution.

3. **Thoughtful Design**

Policy frameworks should encourage design of AI systems that are informed by real-world workflows, human-centred design and usability principles, and end user needs. AI systems should facilitate a transition to changes in the delivery of goods and services that benefit consumers and businesses. The design, development, and success of AI should leverage collaboration and dialogue among users, AI technology developers, and other stakeholders to have all perspectives reflected in AI solutions.

4. **Access and Affordability**

Policy frameworks should enable products and services that involve AI systems to be accessible and affordable. Significant resources may be required to scale systems. Policymakers should also ensure that developers can build accessibility features into their AI-driven offerings and avoid policies that limit their accessibility options.

5. **Bias**

The bias inherent in all data, as well as errors, will remain one of the more pressing issues with AI systems that utilise machine learning techniques. Regulatory agencies should examine data provenance and bias issues present in the development and uses of AI solutions to ensure that bias in datasets does not result in harm to users or consumers of products or services involving AI, including through unlawful discrimination.

6. **Research and Transparency**

Policy frameworks should support and facilitate research and development of AI by prioritising and providing sufficient funding while also maximising innovators and researchers' ability to collect and process data from a wide range of sources. Research on the costs and benefits of transparency in AI should also be a priority and involve collaboration among all affected stakeholders to develop a better understanding of how and under which circumstances transparency mandates would help address risks arising from the use of AI systems.

7. **Privacy and Security**

The many new AI-driven uses for data, including sensitive personal information, raise privacy questions. They also offer the potential for more powerful and granular privacy controls for consumers. Accordingly, any policy framework should address the topics of privacy, consent, and modern technological capabilities as a part of the policy development process. Policy frameworks must be scalable and assure that an individual's data is properly protected, while also allowing the flow of information and responsible evolution of AI. A balanced framework should avoid undue barriers to data processing and collection while imposing reasonable data minimisation, consent, and consumer rights frameworks.

8. **Ethics**

The success of AI depends on ethical use. A policy framework must promote many of the existing and emerging ethical norms for broader adherence by AI technologists, innovators, computer scientists, and those who use such systems. Relevant ethical considerations include:

- Applying ethics to each phase of an AI system's life, from design to development to use.
- Maintaining consistency with international conventions on human rights.
- Prioritising inclusivity such that AI solutions benefit consumers and are developed using data from across socioeconomic, age, gender, geographic origin, and other groupings.
- Reflect that AI tools may reveal extremely sensitive and private information about a user and ensure that laws require the protection of such information.

9. **Education**

Policy frameworks should support education for the advancement of AI, promote examples that demonstrate the success of AI, and encourage stakeholder engagements to keep frameworks responsive to emerging opportunities and challenges.

- Consumers should be educated as to the use of AI in the service(s) they are using.

- Academic education should include curriculum that will advance the understanding of and ability to use AI solutions.

10. **Intellectual Property**

The protection of intellectual property (IP) rights is critical to the evolution of AI. In developing approaches and frameworks for AI governance, MinLaw should ensure that guidance does not undercut IP or trade secrets.

We support MinLaw's effort to provide a clear, practical, and principled Guide for the use of GenAI in the legal sector. By incorporating the App Association's policy principles, the Guide can provide a strong foundation for responsible, ethical, and effective adoption across Singapore's legal sector.

We appreciate the opportunity to provide these views and look forward to continued engagement.

Sincerely,

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