

End-to-End Regulatory Compliance Evolution Pipeline: From Legal Requirements to Developer Tests

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Abstract

As artificial intelligence agents become more prevalent, software systems are becoming even more deeply integrated in our lives while also growing in complexity. In response to societal concerns about safety and privacy, new regulations are being regularly introduced, posing significant compliance challenges for software engineers. This challenge is multifaceted, spanning the interpretation of legal texts, determination of how regulations apply to a specific software product, validation of end-to-end compliance, and, at the lowest level, the need to guide developers throughout this process. This challenge is exacerbated by the constant changes in regulations, requirements, and software systems. We posit that an end-to-end integration of requirements engineering and software testing, down to developer practices, could advance regulatory compliance for software systems. In this vision paper, we present a workflow that operationalizes constantly evolving regulatory requirements into automated developer-focused tests. The novelty of our approach lies in the orchestration of requirements elicitation, regulatory interpretation, traceability, test generation, and developer feedback into a continuous compliance workflow.

CCS Concepts

- **Social and professional topics** → **Governmental regulations;**
- **Software and its engineering** → **Requirements analysis;**
- Software testing and debugging; Software evolution.**

Keywords

Regulatory Compliance, The AI Act, GDPR, Test Case Generation, Software Testing, Requirements Engineering, Software Evolution

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1 Introduction

As artificial intelligence (AI)-enabled software becomes integral to our lives, ethical concerns around privacy, safety, and manipulation, have become prominent. In a recent survey, 84% of participants reported being concerned about their privacy, and many expressed

worries about transparency (37%) and manipulation (42%) [30]. Other surveys reported similar findings [9, 46]. Many of these concerns are explicitly addressed and, in parts regulated, by the General Data Protection Regulation (GDPR) [63] and the Artificial Intelligence Act (AIA) [64], two predominant European regulations with far-reaching global implications. Current software applications provide personalized services and smart assistance across domains, ranging from safety-critical to non-critical, and have thus become key targets for compliance with these and other regulations.

Regulatory compliance has been widely studied in the software engineering (SE) literature, often through isolated efforts split between upstream and downstream stages of software development.

On the *requirements engineering* (RE) side, existing work addresses the elicitation of legal requirements [3, 65, 66], their representation [19, 36, 56, 58, 72], and, to some extent, their operationalization [34, 47]. Much of this work remains at the level of generic legal requirements or compliance checklists, leaving implementation details to the developers' interpretation and creating thereby potential risks of non-compliance [3]. The literature also acknowledges the challenging yet inevitable need to involve legal experts in interpreting and contextualizing regulation into implementable and verifiable compliance requirements [20]. This need is particularly emphasized when software systems must comply with multiple evolving regulations that may overlap or conflict, a complexity that often occurs but is oversimplified in the existing literature.

On the *software testing* side, existing work addresses compliance verification in software [73], e.g., leveraging formal methods [32, 39], or code analysis [61]. However, this research direction often lacks involvement from RE and overlooks the important role of developers throughout the process. Unit tests could facilitate communication about compliant behavior of components. However, existing requirements-based test generation approaches mainly produce abstract test cases that need to be manually executed [69, 71]. The tests remain at the system level, and approaches to create and maintain compliance unit tests [62], meaningful for developers, remain lacking. A challenge lies in the scale of modern systems where many components and teams contribute to compliance [67].

The fragmented nature of these efforts has left persistent gaps between legal requirements derived from regulations, on the one hand, and what is actually implemented in software systems, on the other [27, 43]. These gaps are evident in practice. For instance, a recent survey reports GDPR compliance violations in how mobile applications privacy policies disclose individual rights, which may in turn mirror implementation-level violations [21]. Similar implementation challenges have been documented for the AIA [45, 54, 68].

In this vision paper, we propose a workflow that brings together law, RE, and developer-centered software testing. We call it *RELAI*,



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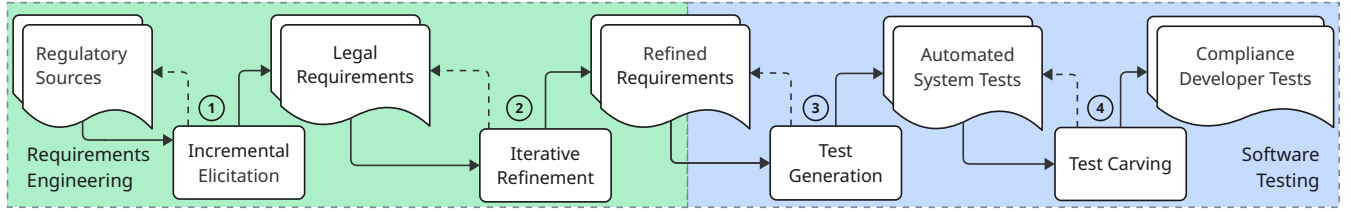


Figure 1: Overview of the end-to-end software compliance workflow.

which stands for *tRanslating legal rEquirements to deveLoper-level test units using AI*. RELAI provides automated support [8, 49] for building compliant-by-design AI-enabled systems and for continuously verifying compliance of systems in response to regulatory changes [2] or code changes [50]. To this end, we propose leveraging *AI agents* to reduce the overhead of manual validation and improve efficiency in the compliance process, while humans-in-the-loop preserve oversight and responsible decision making.

Specifically, our proposed workflow RELAI realizes an end-to-end software compliance workflow to operationalize legal requirements on one end, verify compliance through software tests on the other, and support both evolving regulations and software artifacts, as illustrated in Figure 1. RELAI is composed of four steps: ① Regulation is interpreted, contextualized, and translated into software requirements. ② These requirements are refined and formalized with respect to a particular software, company, and domain. ③ Based on these requirements, matching high-level automated tests for the entire system are generated. ④ These tests are then executed and carved into more focused unit tests aligned with the developers’ contexts. This process incorporates feedback loops to update artifacts based on the impact of software or regulation evolution, informed by trace links between all artifacts.

The novelty of RELAI lies in the orchestration of the above activities. Its contribution to existing research on regulatory compliance is two-fold: First, we introduce *Addressee-focused*¹ requirements elicitation, aligning RE with legal practices. Second, we propose *test carving* as a means to generate developer-centric unit tests from high-level compliance tests [26]. Next, we position our proposed ideas against existing literature and present the workflow in detail.

2 Related Work

This section provides a snapshot of literature on regulatory compliance to motivate and ground our proposed workflow.

2.1 Operationalizing Regulations for Software

Existing work investigates the extraction of compliance-related information and requirements from legal text [5, 12, 58], supported by formalized representations of legal provisions [17, 52, 57]. Most of these approaches largely focus on privacy regulations like the Health Insurance Portability and Accountability Act (HIPAA) and GDPR, while AIA has recently attracted attention through studies interpreting its relevance for SE (e.g., [45, 54, 68]). The advances in AI enabled new directions like privacy requirements generation [53], regulatory changes analysis [2], and the transformation of legal text into code representations [56] or other formal language [69]. While the concept of *addressee* has emphasized in this

context, its explicit integration into the contextualization of legal requirements remains underexplored (*research gap 1*), creating a gap between regulatory analysis in the literature and compliance implementation in practice [20, 21].

The operationalization and refinement of legal requirements has also been studied. Prior work aims to better align system requirements with legal requirements through goal modeling [4], as well as through retrieval-augmented generation with curated legal sources to extract a comprehensive set of legal requirements [3]. Closely related efforts address the formalization of regulatory requirements [42], and the integration of human-values into software development [10]. While existing work emphasizes the need to collaborate with legal experts [18, 20], enabling this collaboration remains underexplored (*research gap 2*). In particular, automated support, shared intermediary languages, and the use of additional authoritative legal sources to increase confidence in building compliant software remain insufficiently addressed.

2.2 Developer-centric Compliance Testing

Existing compliance processes primarily use modeling, stakeholder involvement [40], conflict detection [31], or query-analysis of knowledge graphs [51], which all need human involvement. Literature calls for automating compliance management to reduce costs, avoid errors, and address challenges in continuous delivery and multi-environment management [8, 49, 60]. However, generating executable tests from requirements remains an open challenge (*research gap 3*) [71]. Especially privacy and AI regulations receive less attention in automated compliance compared to security [6, 50, 60].

The typical focus of requirements-based test generation on system tests [69, 71] and compliance checking at the release stage [41], lead to a key compliance challenge: Lack of awareness among developers [1, 67]. To our knowledge, literature has not yet explored in how far established approaches to generate low-level tests, like test carving [26, 28, 70], can address compliance testing and awareness among developers (*research gap 4*). Test carving creates unit and API-level tests that match system tests, with similar coverage, faster execution [70] and meaningful test data [26]. When generating developer-centric tests, a crucial aspect is to select tests that cover relevant behavior [13–15], for which visualizations and trace execution data are promising [16, 37], but not yet investigated.

3 End-to-end Software Compliance Vision

This section introduces our end-to-end software compliance workflow RELAI. It takes regulatory sources (e.g., laws, regulations, guidelines and standards) as input, which over four steps are transformed into developer tests that capture compliance-related behavior of software components. They are connected to corresponding high-level compliance tests and contextualized, refined regulatory

¹Addressee defines the person(s) to which a document is addressed.

requirements. These links enable (i) traceability between regulations and their operationalization in software implementations, enabling efficient compliance audits, (ii) automated, multi-layered compliance checks suited for continuous compliance checking of changing software systems, and (iii) operationalizations of regulations that are highly developer-centric through being encoded as executable verification of a software component.

3.1 Operationalizing Legal Requirements for Software Compliance

Translating regulation into software requirements requires shared understanding between legal experts and requirements engineers. Our workflow supports automated end-to-end compliance in two steps: (i) eliciting contextualized legal requirements tailored to a specific software application, and (ii) refining high-level requirements into concrete software requirements grounded in legal sources.

3.1.1 Eliciting Contextualized Legal Requirements. This step derives a complete set of legal requirements relevant to a specific organization, such as *providers* or *deployers* of AI systems [68]. We focus only on requirements that can be implemented in software. Since this process requires knowledge of both the system and the applicable regulations, it should be carried out jointly by requirements engineers, who validate the context, and legal experts, who validate the legal interpretation and resulting requirements. The involvement of legal experts can be facilitated through established interdisciplinary collaborations, for which lessons learned have been documented in prior work (see [55]).

Current AI technologies have demonstrated promising capabilities in understanding text, including legal statements [44]. To establish shared knowledge among different experts, a possible research direction is to build AI agents for **creating intermediate representations**. This could involve an agent for **rewriting legal texts with respect to a specific addressee**, on the one hand, and another for rewriting technical documentation about the software system, on the other, to capture relevant roles, responsibilities, and actions. In this way, it becomes explicit *who* must do *what*, *under which circumstances*, and *with which evidence*.

Key challenges include: (i) Regulatory obligations are often interconnected and distributed across multiple provisions, including different articles within the same regulation and references to external regulations. We envision **extract obligations together with their context of applicability**, such as conditions and exceptions. (ii) Regulation changes: new provisions, amendments, and guidelines may alter the applicability or content of previously derived obligations. We therefore aim to build **AI-enabled incremental elicitation methods** that identify regulatory changes, analyze their impact on elicited legal requirements, and update only the affected ones.

RQ1. How can incrementally derive comprehensive, addressee-centric, machine-analyzable legal requirements from evolving regulations, informed by software technical documentation?

We propose evaluating this RQ by comparing between the automatically extracted addressee-centric requirements and manually elicited ones in terms of completeness and software-relevance.

3.1.2 Refining Legally-grounded Software Requirements. This step iteratively refines the extracted legal obligations into implementable software requirements that can be systematically integrated into subsequent software engineering activities. While software requirements are concrete and context-dependent, regulations typically state generic obligations and leave key implementation details underspecified. Moreover, both the regulations and software systems may evolve. Refinement is therefore an iterative activity that connects regulatory changes with changes in software artifacts.

We foresee two research opportunities. The first is to **leverage additional authoritative sources**, such as guidelines, technical standards, and relevant case law, to better understand these obligations for a specific software system and its context [3]. The second is to **complement top-down legal interpretation with bottom-up evidence from the state of practice**.

Key challenges include: (i) Regulations are often subject to interpretation, depending on the specific application context. We therefore propose **defining refined requirements with varying degrees of compliance** [59], corresponding to the legal sources from which the requirements are extracted. (ii) Compliance state of practice may vary across contexts, resulting in various implementations emphasizing the interpretative variability described in (i). We envision **pursuing empirical methods**, including interviews and surveys, to better understand existing compliance practices (iii) Regulations and software artifacts change independently. We therefore aim to support **bidirectional change impact analysis**, where regulatory changes are traced to the software requirements and artifacts they affect, and software changes are traced back to the legal obligations whose interpretation or implementation may need to be revised.

RQ2. How can we systematically and iteratively refine legal requirements derived from multiple regulations within a concrete and evolving software application context?

This RQ can be evaluated through coverage assessments, comparing automatically-derived detailed requirements against existing ones implemented in a given software system.

3.2 Generating Developer Tests for Compliance

Based on contextualized software requirements, our workflow supports compliance testing in two steps: (i) automatically translate legal requirements into high-level system tests, validated by domain experts, and (ii) carve these into low-level tests that provide fast, actionable feedback to developers on component-level compliance.

3.2.1 Defining System Tests for Regulatory Compliance. This step transforms regulatory requirements into automated high-level tests that exercise the entire system through the user interface and validates them with domain experts. The validation process and traceability to requirements play a key role in creating a shared understanding of the regulations between legal experts and engineers and trust in the automated compliance process.

Generative AI can support the generation of automated tests from requirements. However, it remains prone to hallucinations and other issues requiring substantial manual intervention from engineers [38], and can increase the burden on experts to validate their outputs [35], which may outweigh the value of automatic

generation [13]. Research opportunities include exploring and validating **visualization techniques for lightweight test validation by experts**, leveraging automated test recordings and automatic transfer of validations between similar tests.

The challenge in testing is to choose the right concrete examples to be confident the software behaves correctly [7]. For regulatory compliance one execution might not be enough, e.g., to show that each datapoint collected is also used (data minimization from GDPR). We propose learning from current compliance approaches how they select the inputs they exercise to verify compliance. With this, we develop a **compliance-focused understanding of test adequacy** and input space coverage [22, 33].

Automated compliance tests enable continuous compliance checking of evolving software systems, providing feedback to engineers whether changes affect compliance behavior. If regulations change, this step can be re-executed in a diff-focused manner: Leveraging the knowledge from previously validated tests [15, 24] and proposing updates of existing tests, lowering the validation burden [25].

RQ3. How can we generate adequate and automated end-to-end compliance test suites and efficiently validate them with legal experts and engineers?

This RQ can be evaluated by comparing the coverage of generated tests with existing manual compliance checking approaches, and by user studies with engineers and legal experts.

3.2.2 Carving Tests for Developer-centric Continuous and Automated Compliance. To give continuous and meaningful feedback to software developers, the second step carves the end-to-end tests into smaller tests, typically called unit or developer tests [62]. *Test carving* [26, 28, 70] refers to tracing the execution of a high-level test through a software system and defining shorter tests that replay one step of that execution. These unit tests are closely connected to the components that developers work on, making them cheaper to execute. They provide feedback and can help developers understand how compliance concretely impacts their component. This defines a compliance process for sub-systems, and increases awareness among developers about compliance requirements, addressing challenges in software compliance identified by Usman et al. [67]. The connection between the carved test cases, their end-to-end tests, and their regulatory requirements also provide traceability [17, 23, 37] down to the code level, indicating where in a software system compliance is realized. We envision designing and validating code-centric **visualizations** of carved developer tests **that facilitate comprehension of compliance-contribution** [16].

A challenge is to distinguish which behavior is relevant for complying with the regulatory requirement and worth capturing as a regression test [13, 15]. Future studies should explore how to **identify regulation-related behavior** through tagging and data-flow analysis, including reducing engineer input **by leveraging semantic information** in code and documentation. This information can also be used for test selection and prioritization [11, 29, 48].

This automated step allows developers to efficiently update their tests to changes in regulations. Carving failing compliance system tests, e.g., after a regulation change, helps developers reason about how to address the change in their component.

RQ4. How can we carve effective developer tests for compliance, that capture relevant behavior and inform developers about the compliance contribution of their components?

This can be evaluated by measuring the developers' effectiveness of capturing and localizing compliance regressions with carved tests compared to high-level tests.

4 Application Scenario

To illustrate the complex scenarios that we envision RELAI to contribute to, consider an AI companion for seniors which offers personalized assistance through voice guidance, customized workouts, and motion analysis². AI companions may influence behavior (AIA, high-risk) and process sensitive personal data (GDPR). They are complex software systems composed of multiple interconnected components, ranging from user interfaces to thousands of lines of code. RELAI supports compliance checking by decomposing end-to-end obligations (e.g., transparency toward users) into executable tests that capture how individual components, such as data processing or model inference, contribute to compliance, providing developers with concrete, actionable feedback.

For instance, processing sensitive data may be important to enable the personalized and effective functioning of an AI companion. However, such processing must remain limited under GDPR data minimization principles (e.g., Article 5(1)(c)). This constraint may affect the system's ability to fulfill transparency requirements (AIA, Art. 50). Since the AIA imposes different obligations on providers versus deployers of an AI system, an addressee-centric elicitation can inform compliance testing in this case. For instance, compliance testing for a provider might focus more on the design level, e.g., AI-relevant generated content, audio, text, video, or text, can be technically marked and detectable where required. Testing for a deployer, on the other hand, might focus more on system-user interactions, e.g., checking whether the deployed interface actually informs the user at the right moment or that sensitive data in is exposed only when necessary. The same technical behavior might therefore require different addressee-dependent tests, where provider needs to show that the system is capable of delivering transparent AI-interaction, whereas the deployer needs to show that such a capability is actually used appropriately.

Building compliant AI companions is further complicated by the dynamic nature of both the regulatory and technical landscape: regulations evolve over time, new guidelines and standards emerge, and AI companions themselves continuously evolve, introducing new services and updates. By explicitly linking legal requirements to software tests, RELAI supports targeted updates and continuous reassessment as both regulations and software evolve.

RELAI builds on well-established practices in RE and software testing, providing an end-to-end workflow that *orchestrates* established activities and innovative approaches to support continuous compliance in view of regulatory and software evolution.

²NYTimes on ELI5: ai-robot-senior-companion

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Data Availability Statement

There is no data available yet.

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