

Conceptualizing an ethics framework for co-creation in the public sector

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Abstract

Purpose – Co-creation is increasingly used in the public sector for the development of public policies and services. The purpose of this paper is to empirically establish a framework for ethical co-creation in the public sector.

Design/methodology/approach – A mixed-method approach was used to collect data and cross-analyse four pilots from a three-year EU-funded project.

Findings – The results from this study highlight the need for an ethics co-creation framework to be provided at the start of a project that can support the co-creation strategy, process and implementation of the outcome. Such an ethics framework must be flexible in order to address issues that vary according to public service, policy being developed and local context.

Originality/value – Current legal and ethical frameworks for the public sector do not cover all the activities in public sector co-creation. This work is original and important as the use of co-creation in the public sector becomes increasingly important.

Keywords Co-creation, Public sector organisations, Ethics risks, Ethics framework, Cross-case analysis

Paper type Research paper

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1. Introduction

Co-creation has broad applications in the field of collaborative governance, and, by involving a broad range of actors and activities, is to help solve complex problems, foster innovative solutions or provide high-quality and user-centric public services (Rodríguez Müller *et al.*, 2021). When public sector organisations (PSOs) engage in collaborative activities and interact with civil society, they may face ethical challenges, such as power or representation imbalances, fail to achieve inclusion and transparency or be unable to address conflicting values (Edelmann and Voigt, 2024). To minimise deviations, PSOs' activities and behaviours are mandated by law and policy regarding management, accountability, control and the cultivation of a culture of public integrity (OECD, 2024). However, legal regulations and frameworks may not always be able to cover all activities across all PSOs, and some ethical risks may not be legally covered (World Economic Forum, 2023). The research presented here highlights the growing importance of the ethics dimension in the development of public policies and services. Although there are legal frameworks and ethical guidelines for PSOs, these are inadequate for co-creation processes, as they are either too broad, focusing on integrity or management (European Court of Auditors, 2019) or are very specific, addressing, for example, the use of artificial intelligence (AI) (High-Level Expert Group on AI, 2019). Ethical guidelines for public participation processes (e.g. those by the International Association for Public Participation, 2007) may be better suited but still fall short due to the differences between co-creation and public participation. Co-creation and public participation both represent participatory approaches (Bobbio, 2019), but it is important to differentiate between the two. Public participation is direct participation by non-governmental actors in decision-making and includes many different activities, such as the opportunity to send written comments, referenda, participating in demonstrations, taking legal action, by different stakeholders, such as citizens, private sector organisations, public interest groups or economic interest groups (Priscoli, 2004). It promotes democracy in decision-making or policy-making and aims to incorporate public concerns, needs expertise and values in governmental decisions (Howlett, 2023). Co-creation, a concept from the private sector (Branden and Honingh, 2018), involves stakeholders in policymaking, public service design and delivery (Strokosch and Osborne, 2020; Torfing *et al.*, 2019).

The aim of this paper is to develop an ethics framework for co-creation in the public sector. The framework draws on established ethics frameworks for research in the public sector (European Commission, 2023a), public participation (International Association for Public Participation, 2007) and results derived from the EU-funded project Inclusive Governance Models and ICT Tools for Integrated Public Service Co-Creation and Provision (inGOV, 2023b) where, between 2021 and 2023, four European PSOs from Austria, Greece, Malta and Croatia developed co-creation pilots. The diversity of the pilots highlights the need to address emerging ethical challenges of co-creation in different contexts and settings, mechanisms as well as the actions used to address and resolve them. Therefore, our research question is:

RQ. What key dimensions contribute to an ethics framework for public sector co-creation, and what instruments or actions should be considered to address these dimensions?

A comprehensive framework for co-creation in the public sector could support PSOs worldwide implement co-creation projects, identify and mitigate the ethics risks.

The rest of this paper is structured as follows. Section 2 provides an overview of co-creation and the ethics guidelines available for the public sector. Section 3 describes the research design, whilst Section 4 includes the results obtained. In Section 5, the results and

discussed. The study closes with a discussion in Section 6 about the key building blocks of an ethics framework for co-creation in the public sector.

2. Background

Co-creation is a concept originally developed by [Vargo and Lusch \(2004\)](#) to rethink how value is created in the private sector. Customers are not to be seen as passive recipients but as active participants and valuable collaborators in the value creation process as their knowledge, preferences and context shape the outcome. They argue that value is co-created through interactions between providers and customers during the use of the service, and often involves multiple actors (e.g. suppliers, partners, users) within a value network, rather than being just a dyadic firm–customer relationship. The concept of co-creation has become central in PSOs, understood as a process that supports collaborative, user-centred governance to solve complex problems and leads to mutually valued outcomes and innovation in public sector policymaking, service design and delivery ([Strokosch and Osborne, 2020](#)). In co-creation processes, public and private actors are to solve a shared problem, challenge or task through a constructive exchange of different kinds of knowledge, resources, competences and ideas ([Torfing et al., 2019](#)). Several stakeholders can be involved, including external stakeholders, such as citizens and internal stakeholders, such as public servants ([Nabatchi et al., 2017](#)). The expertise that different stakeholders contribute is seen as a way to bridge the gap between PSOs and service users (e.g. citizens) and to provide better-integrated, coordinated services ([Lember et al., 2019](#)).

Co-creation is a form of citizen involvement, but it is important to conceptually distinguish it from public participation. Both co-creation and public participation involve collaboration, but they differ significantly in terms of context, purpose and structure ([Foth, 2017](#)). Public participation focuses on the involvement of citizens in decision-making processes related to public policy, planning or governance with the aim of improving democratic legitimacy, transparency and responsiveness of public institutions ([Priscoli, 2004](#)). Co-creation, by contrast, denotes a more non-political collaborative form of participation in which public sector organisations and citizens (or other stakeholders) jointly define problems, design solutions, but may also engage in the implementation or evaluation of public services ([Voorberg et al., 2015](#); [Brandesen and Honingh, 2018](#)). The co-creation literature highlights that this mode of collaboration builds shared ownership and reshapes the underlying public service logic, making it more transformative than traditional participation formats ([Ansell and Torfing, 2021](#)).

PSOs and political leaders responsible for the implementation of co-creation processes in the public sector ([European Commission, 2023a](#)) rely on legal frameworks. The [Charter of Fundamental Rights of the European Union \(2012\)](#) outlines rights related to dignity, equality, solidarity, justice and data protection, including bioethics and guaranteeing transparent administration. Compliance with General Data Protection Rules ([General Data Protection Regulation, 2016](#)) and national laws are essential to protect citizens' rights when collecting, storing and sharing data during collaboration processes. The European Declaration on Digital Rights and Principles, [European Commission \(2022\)](#) emphasises key rights in the context of digital transformation, such as freedom of expression, information, data protection and privacy. These legal frameworks secure citizens' data and can support the implementation of results, but they neither ensure participation, nor do they address the specific characteristics of co-creation activities in the public sector which can differ by scope, project and other variables.

Ethics standards are significant in the public sector, as they contribute to decision-making processes and strategies, manage actions and decisions regarding public resources and interactions

with citizens, ensuring trust in government and its institutions ([Gueras and Garofalo, 2010](#); [Mitu, 2009](#)). Several ethics frameworks and reports that have been developed during the last years with the aim to support and guide PSOs' activities, for example:

- Public Sector Integrity ([OECD, 2005](#)).
- Recommendation of the Council on Improving Ethical Conduct in the Public Service Including Principles for Managing Ethics in the Public Service ([OECD, 2014](#)).
- International Framework: Good Governance in the Public Sector ([Chartered Institute of Public Finance and Accountancy and International Federation of Accountants, 2014](#)).
- Ethics guidelines for trustworthy AI ([High-Level Expert Group on AI, 2019](#)).
- Guidelines of the Committee of Ministers of the Council of Europe on Public Ethics ([Committee of Ministers of the Council of Europe, 2020](#)).
- Ethics of connected and automated vehicles – Recommendations on road safety, privacy, fairness, explainability and responsibility ([European Commission, 2020](#)).
- Good Practice Principles for Data Ethics in the Public Sector ([OECD, 2021](#)).
- Anti-Corruption and Integrity Outlook ([OECD, 2024](#)).

However, ethics has not yet been institutionalised in PSOs ([Bishop and Connors, 2018](#)). The OECD's principles for managing ethics in the public sector state that PSOs should have ethics infrastructure and practices for guidance, management and control to cultivate a culture of public integrity and enable effective accountability ([OECD, 2024](#)). For the [Committee of Ministers of the Council of Europe \(2020\)](#), the term "public ethics" is the "practical implementation of ethical standards by public officials whereby the public good is placed before private interests in accordance with the law so that confidence and the trust of citizens in the action and decisions of public officials and public organisations are maintained and strengthened" (no p.). The public ethics framework developed by the [Committee of Ministers of the Council of Europe \(2020\)](#) provides obligations for public officials and public organisations, as well as clear standards of conduct citizens should expect of all public officials and public organisations. According to the [Committee of Ministers of the Council of Europe \(2020\)](#), the components of a public ethics framework should have sufficient resources to ensure effective implementation and a national strategy adapted to regional and local levels. In addition, the public ethics framework should have clear mechanisms and procedures to investigate and address possible breaches of ethical standards or other issues of concern about public ethics. Codes of conduct play a special role in ensuring the effectiveness of the public ethics framework and should reflect the principles of public ethics, the standards of conduct described in these guidelines and the Council of Europe standards. The European Court of Auditors point out that "Ethical conduct in public affairs means that civil servants and public office holders should serve the public interest, manage public resources properly, and make fair decisions. It contributes to sounder financial management and increased public trust, which is indispensable if public policies are to succeed" (2014, p. 4). In a later audit, the [European Court of Auditors \(2019\)](#) noted that while the audited institutions had established adequate ethical frameworks, there is still the need for an overall strategy on ethics, formalised procedures for checks on declarations and assessment criteria, a written standard procedure, a focus on gifts and entertainment policies, whistleblowing and post-mandate provisions. In 2023, the European Commission suggested the creation of common ethics standards for all EU institutions, the "Ethics Body", [European Commission \(2023b\)](#) to "help avoid unnecessary differences among the institutions"

standards and help promote a common culture of ethics and transparency, clarity and publicity for all members (political appointees) of EU institutions and bodies” (no p.). In 2024, the European Parliament, the Council, the Commission, the Court of Justice, the European Central Bank, the European Court of Auditors, the European Economic and Social Committee and the European Committee of the Regions the European Commission agreed and approved the creation of a EU body to strengthen integrity, transparency and accountability in European decision-making ([European Parliament, 2024](#)).

Several scholars have considered the role of ethics in the public sector. [Amundsen \(2009\)](#) understands the state as “[...] the main provider of rights as understood by most people and in most circumstances” (p. 10) and highlights the difference between public sector ethics and the “personal ethical values and principles of individuals” (p. 10). [Kinchin \(2007\)](#) notes that the ethics of public service should be based on five basic virtues: fairness, transparency, responsibility, efficiency and no conflict of interest. However, [Amundsen \(2009\)](#) highlights that public servants face several dilemmas, and that their personal ethics may collide with professional or organisational culture ethics. A code of ethics for public participation can help address the deficits of inclusion in representative democracies and the internet’s promise for greater inclusivity ([Pereira, 2015](#)). Guidelines for public participation and digital public participation (e-participation) have been developed in several countries, e.g. by the International Association for Public Participation ([International Association for Public Participation, 2007](#)). The IAPP includes a “Code of Ethics” ([IAP2, 2026](#)) so that public participation practitioners can enhance the “integrity of the public participation process” (p. 1). This code of ethics describes principles to help guide and enhance the integrity of a public participation and considers the purpose of participation as a way to make better decisions, the role of the practitioner to be responsive to the public, trust and credibility, the definition of the public’s role, the openness of information provided, stakeholders’ access to the process, respect for communities, advocacy for public participation, commitments made and how new practitioners and audiences can be best supported.

[Parsons et al. \(2021\)](#) note that the ethical context in which service providers operate is often not considered, something they consider to be a serious oversight. Previous research shows that ethics has an impact on several dimensions that are relevant to co-creation, including ensuring inclusiveness and participation; building trust; user privacy and data security; preventing biased inputs and responses; specific privacy issues regarding the service’s target audience ([Edelmann and Voigt, 2024](#)). Whilst the literature highlights the growing importance of the ethics in public sector co-creation, studies provide only preliminary guidance (e.g. [Kirjavainen and Jalonen, 2022](#)). Research ethics for research activities funded by the EU ([European Commission, 2023a](#)) can help manage some of the ethical issues inherent in co-creation, such as data collection process, data management, storage and analysis can contribute a basis for ethical co-creation activities in the public sector. However, [Von Heimburg et al. \(2021\)](#) highlight that co-creation has specific ethics issues that need to be addressed, e.g. who should participate, how, where and for what purpose and with what consequences. Ignoring the ethical context and issues can lead to services users being neglected or harmed, have “spill over” effects beyond those intended or affect a wider audience than originally envisaged ([Black and Gallan, 2015](#)). Existing legal frameworks and ethical guidelines can be drawn on to address some ethical issues related to co-creation, but there is a lack of clear ethical guideline for co-creation activities in the public sector. Therefore, in this paper, we aim to draw on existing knowledge as well as results from recent research to answer the following research question is: What key dimensions contribute to an ethics framework for public sector co-creation, and what instruments or actions should be considered to address these dimensions? The results from this empirical

research contribute to the development of a “Framework for Ethics in Public Sector Co-creation” and to the literature on co-creation in the public sector.

3. Research design

To analyse co-creation activities conducted by the PSOs, a cross-case analysis research design using both quantitative and qualitative research methods was used to collect data. The use of a mixed-method design and cross-case analysis offers several advantages, especially in complex research contexts such as organisational studies and the public sector (Fitzpatrick *et al.*, 2023). It provides comprehensive understanding by combining qualitative data (in this study, collected during several workshops) and quantitative data (here, through surveys). This enables the researchers to explore both how and why phenomena occur, as well as how often or to what extent. The triangulation of the data collected increases the validity and reliability, helps reduce bias and strengthens the credibility of results. In addition, it allows the researchers to adapt to emerging findings during the research process, which is particularly useful in participatory or co-creative research, where stakeholder input may shift the research focus. Lastly, this design is useful for developing nuanced models that reflect real-world complexity and are useful for policy and decision-makers (Chandanabhumma *et al.*, 2023).

The research approach is a “theoretical elaboration” (Vaughan, 1992) based on an exploration of a specific phenomenon (co-creation in PSOs), where the goal is not theory testing in a deductive, positivistic sense, but an elaboration through analysis of the same phenomenon from different perspectives. The following study was designed by three researchers involved in the three-year EU-funded project inGOV, which collects and compares data from four European pilots conducted in PSOs in Austria, Croatia, Greece and Malta. The pilots are implemented in PSOs using the same co-creation process to create, update and digitalise a public service. Each co-creation pilot is context-significant, that is, they differ in terms of country they are conducted in, the public service area, level of governance and the legal frameworks they draw on and the outcome to be achieved.

3.1 Co-creation cases

The aim of the inGOV project is to use a co-creation process that enables stakeholders’ collaboration to develop inclusive and accessible public services and increases citizens’ trust and satisfaction in the public sector. The cases are represented by the project’s four pilots (see Table 1). The pilots were conducted by four European PSOs: in Malta, the pilot was the modernisation and digitalisation of the family household public service (affecting 200,000 households); in Austria, the pilot was to deploy and digitalise the overnight-stay tax process (affecting 3,200 accommodation providers in the region of Lower Austria); in Greece, the pilot was to digitalise the disabled persons’ transport card renewal service (benefiting 11,500 disabled, low-income citizens); in the Croatian pilot, to create AI-driven virtual assistants and services (affecting 32,000 citizens). The use of the pilots in the project was to provide feedback on the use of co-creation in a real-life environment, reveal the value and effectiveness of co-creation, obtain and transfer valid results into EU policies and to align research and practice with policy. All pilots used the same co-creation process to identify and engage stakeholders, collaborate with stakeholders, gather and analyse data but each pilot differs according to the aim, the political level, the legal framework for digital services (e-government) and co-creation goals to be achieved (see Table 1). The difference between the cases is important both the project but also for this study, as this strengthens the validity of the results obtained, and highlights the flexibility and usefulness of co-creation. In

Table 1. Co-creation pilots

PSO and country	Political level	Legal framework	Ethical support provided to the pilot	Co-creation goal
Federal Government of Lower Austria, Austria	Federal	E-Government Act [38]	University Ethics Board	Digitalisation of the overnight-stay tax process in Austria
City of Bjelovar, Croatia	Municipal	Electronic Document Act [39]	Ethics Board set up by the City of Bjelovar	Chatbot
Region of Thessaly, Greece	Regional	eGovernment Act [40]	University Ethics Board	Digital application for citizens with a disability for a discounted travel card
Malta Information Technology Agency, Malta	National	Reuse of Public Sector Information Act [41]	Ethics Board with Members from PSOs	Digital integration of public services for each household

addition, the different cases contribute to this study by revealing the need for an ethical framework that reflects diversity and flexibility typical of the public sector.

3.2 Ethical approval of co-creation activities within the pilots

The inGOV pilots were supported by ethical boards (see [Table 1](#)) and the project's ethics manager ([inGOV, 2023a](#)) that details the ethical requirements regarding the project, the pilots and the involvement of all participants (including pilot users, stakeholders, etc.):

- The procedures and criteria used to identify/recruit research participants;
- Clarify whether vulnerable individuals/groups will be involved, the measures to protect them and minimise the risk of their stigmatisation;
- Details on incidental findings policy; and
- Copies of approvals by ethics committees and/or competent authorities prior to the start of the relevant activities must be submitted.

4. Research methods

4.1 Workshops

Workshops provide a participative and interactive method that fosters engagement, collaborative discussions and constructive feedback between the participants ([Lain, 2017](#)). In October 2023, a workshop was held in Zagreb, Croatia, with all the participants from the inGOV ([inGOV, 2023b](#)) project consortium, representing 12 European organisations from academia (three), the public sector (the four pilots), two technical SMEs and three think-tanks. The 28 participants were split into three groups: one group consisted of four participants who joined online, and two onsite groups with 11 and 12 participants respectively. Each group was facilitated by a researcher who acted as a moderator (see [Table 2](#)).

During the workshop, three researchers acted as facilitators and asked the participants to discuss the impact of legal frameworks on the management of co-creation processes and outcomes, the role of ethics in co-creation in the public sector context and the ethical aspects PSOs needed to address during the pilot. The workshop lasted 1.5 hours for all three groups, and the researchers recorded and noted all the discussions. Following the workshops, they categorised the data according to the themes of the workshop, then collectively reflected on

Table 2. Participants in the workshop “ethics of co-creation”

Workshop “Ethics of Co-creation”	Participants academia	Participants PSO (incl. pilots)	Other participants: technical SMEs think-tanks	Total participants
Onsite group 1	1	3	6	11
Onsite group 2	1	3	7	12
Online group 1	2	2	–	5
$\Sigma 28$ (incl. 1 facilitator/group)				

and analysed the data. Any responses that three researchers could not agree on in terms of meaning was excluded.

4.2 Survey

Survey research is a popular method used in social sciences to gather data from a predefined group of respondents (Van Selm and Jankowski, 2006). The follow-up survey was developed based on the responses collected during the workshop, and the aim was to collect further details from the PSOs regarding their experiences of the pilot. The survey contains open-questions and was developed by the three researchers to collect further details specifically on:

- (1) Ethics issues in co-creation, the discussion of how co-creation ethics topics help PSOs respond to societal needs and develop adequate response strategies.
- (2) How PSOs identify and understand ethics challenges that arise.
- (3) How PSOs assess and address ethics risks.

Each PSO responsible for a pilot responded to the survey during the period 6 November 2023 to 18 November 2023.

5. Results

In this section we present, firstly, the results from the workshop (Section 4.1) and, secondly, the results from the follow-up survey sent to the PSOs to gain more specific details about their pilot (Section 4.2). We summarise the results in Section 4.3 to highlight the key dimensions that can contribute to an ethics framework for public sector co-creation.

5.1 Workshop: the impact of legal frameworks and ethics on co-creation in the public sector

Legal frameworks are central to PSOs, and a co-creation project must ensure good data governance, be unbiased, trustworthy and achieve outcomes with high standards. European PSOs adhere to the General Data Protection Regulation (GDPR, 2023) as this supports natural persons’ fundamental right in relation to the processing of personal data and the well-being of natural persons. Thus, legal frameworks such as the GDPR can help guide co-creation activities by providing guidelines on data collection, storage and sharing data. Whilst legal frameworks ensure compliance, their implementation require support by data protection officers (DPOs), may impact political decision-making, prevent access to data and databases and collaboration between PSOs. In addition, the GDPR highlights that in an online context, there are several risks regarding the processing of personal data (nine). Thus, the PSOs’ pilots are confronted with legal and ethical challenges, ensuring ethical behaviour during data collection processes hampered by the CoVID-19 pandemic, the use of new digital tools and

processes, and avoiding the digital exclusion of relevant stakeholders. The data generated must be stored, tracked and checked, and technical aspects should not facilitate breach. The use of data lakes or the provision of services outside the EU are deemed to be risky, prone to abuse and seen as reducing trust. Legal and ethical issues in the public sector often overlap, and the difference between the two was noted. However, the difference is not always clear, leading to situations perceived as legal but not ethical, particularly regarding user privacy and data security, specific stakeholders' privacy issues and preventing bias:

- (1) *Ensuring user privacy and data security.* PSOs must ensure high ethical standards and therefore consider:
 - Who is responsible for the data collection process and processing of data?
 - How will data be stored and transferred during the project?
 - How will data be preserved and shared once the project is completed?
 - How will data be maintained and disposed of?
 - How will data be published?

The workshop participants argued that issues regarding data during co-creation processes may vary according to the co-creation process or aim and should be resolved using EU-based management and exchange agreements regarding data processes and transfer.

- (2) *Specific privacy issues regarding the service's target audience.* Inclusion is a legal aspect, and PSOs must legally comply to accessibility issues; however, inclusion is also an ethical aspect. Stakeholders must be able to contribute data and feedback throughout the data collection processes and on the implementation of the outcome. This raises several questions, such as whether different groups of users should have access to different services, whether to implement digital first public services, and how to ensure that all have equal access to a public service. Digital inclusion can be guaranteed through the implementation of guidelines for disabled people or the secure web content accessibility guideline ([WAI/W3C, 2026](#)), but may lead to a digital divide, as users may not have the necessary tools or mobile phones or be unable to (easily) access the internet. Citizens with a disability or vulnerable citizens should not be at a disadvantage when using digital or paper-based public services.
- (3) *Preventing biased use of user inputs and biased responses.* A technical solution should prevent an ethical breach when personal data is necessary or entered by mistake. However, preventing biased inputs and responses in co-creation requires a substantive and refined strategy. To prevent bias, an ethical strategy for co-creation activities in the public sector must protect the users' privacy and their data but also address justice, inclusion and transparency.

5.2 Follow-up survey: the impact of the ethics challenges on the pilots

The workshop results seem to lead to the understanding that data management is important and that ethics have little impact on co-creation activities. However, the PSOs responses from the follow-up survey reveal that they did in fact face ethical challenges regarding stakeholder inclusion, trust, privacy and needs and used a range of mechanisms and strategies to address them ([Table 3](#)):

- *Ensuring inclusiveness and considering stakeholder participation and input.* To ensure stakeholder involvement in co-creation processes, PSOs used telephone contact to foster participation. Giving feedback was reported as an important

Table 3. Mechanisms and strategies to address ethical issues in co-creation

Ethical challenge	How PSOs addressed the ethical challenges	Pilot
(1) Stakeholder inclusion	Conduct telephone interviews to collect data Hold in-person workshop to collect data Continuous provision of feedback from PSO to participants Allow service-users to provide feedback on the content/chatbot answers	Austria Croatia
(2) Trust	Develop activities that increase trust during participation Service is to provide accurate and correct answers Support PSOs develop a mindset for collaboration	Malta Croatia Malta
(3) Privacy	Limit who has access to service-users' conversations Anonymise user conversations/content during service use Verify accuracy of responses/content provided to service-users by comparing multiple sources Check all given information by comparison across multiple websites	Croatia
(4) Specific needs	Learn about the target groups' specific needs	Greece

measure to ensure that stakeholders contributions are considered and to encourage future participation. One PSO (Austria) highlighted the importance of conducting at least one in-person co-creation activity, as most meetings now occur online.

- Public administrators must take actions to *build trust in the co-creation processes* itself. The lack of trust may stem from a fixed mindset and set ways of working within the PSO itself, limiting both the scope and the aims achieved. Several activities were implemented to ensure that ethical challenges could be avoided through the development of trust in co-creation and the PSO.
- *Ensuring user privacy and data security*; Respondents drew on legal frameworks and other measures (e.g. use of dummy data) to ensure user privacy and data security. Additionally, PSOs addressed data security concerns during the design phase by limiting access to interaction logs or preventing the accidental input of sensitive data. Accidental input of sensitive data can happen when a user mistakenly believes the information is necessary to obtain an answer. For example, the user might provide their full name and Social Security number, thinking that registration is necessary to use a public chatbot. Thus, the Croatian pilot responded to this by making conversations with the chatbot anonymous and cross-checked. To ensure that public services provide the most accurate answer possible, even if the user inputs are unclear due to language barriers, misinformation or other factors, mechanisms must be in place that guarantee the accuracy of the information.
- *Service's target audience specific needs*: This category of ethical issues reported by PSOs extends both the first ethical challenge (stakeholder inclusion) and the third challenge, privacy. The co-creation process must be developed so that the stakeholders are able to state their views, experiences and needs, for example, the solution developed by the Greek pilot for disabled citizens.

In the survey, the pilots reported that the key lessons learnt that contributed to the overall success of the co-creation pilots were the adherence to ethical principles in legal frameworks, the early and continuous consideration of ethics in co-creation, the involvement of ethics experts, the use of ethics guidelines and the engagement with stakeholders to align their needs (see [Table 4](#)).

Table 4. Pilots' strategies for integrating ethical considerations into decision-making processes

Pilot	Strategies for integrating ethical considerations into decision-making processes
Austria	Adherence to ethical principles through regular review of laws, actions, and implementation (1)
Croatia	Specific focus on ethical aspects in co-creation activities (2) Frequent communication with ethics manager, iterative meetings with Bjelovar's data protection officer and the mayor for mutual understanding and approval of ethics expectations (3)
Greece	Follow all instructions from the Department of Ethics, University of Macedonia, which supports the Greek pilot (4)
Malta	Continual engagement with stakeholders to align with public needs (5)

5.3 Summary of the results

The results highlight that PSOs that engage in co-creation activities adopt a precautionary approach (European Parliament, 2015) to deal with the ethical challenges, meaning that, when the legal framework doesn't cover all ethical issues related to a project, they draw on a range of measures and instruments to deal with any ethical issues that may arise. When PSOs address ethical issues on a case-by-case basis, an ethics framework for co-creation in the public sector must be able to address ethics challenges typical for co-creation, retain flexibility and be able to adapt to local circumstances. A framework that supports co-creation activities in the public sector must consider in particular ensuring inclusiveness and stakeholder participation and input; building trust in co-creation processes; ensuring user privacy and data security; preventing biased use of users' inputs and biased responses; and considering specific privacy issues regarding the service's target audience. Table 5 contains a description of the five co-creation challenges identified in this study, how instruments and actions from research ethics (European Commission, 2013) and IAP2 ethics principles can provide support (IAP2, 2026), whilst the column "dimensions" summarises how the results from study contribute to an ethics framework for co-creation in the public sector. It is important to note that some instruments and actions can address multiple dimensions simultaneously.

6. Discussion

PSOs' current use of the precautionary principle is useful (European Parliament, 2015); however, it presents challenges and risks especially in complex contexts, and the use of diverse measures may lead to unpredictable responses. As public policies and services involve various actors and impact different groups of citizens, co-creation aims to *ensure inclusiveness and stakeholder participation and input* is at the centre of the co-creation process. At the start of the project, it is important to take the time to identify all relevant public (e.g. secretariats, offices), private (e.g. companies, associations) and civil society (e.g. trade unions, NGOs) actors who may be involved in the development of the public policy or service. Co-creation managers must remain mindful of stakeholder diversity, particularly when the policy or service in question may impact different populations in varied ways. It is essential to consider diversity in terms of gender, age, ethnicity, physical condition, LGBTIQ+ populations, among other groups. New stakeholders may emerge during the process; in such cases, it is important to have a strategy for integrating these stakeholders into the ongoing project. When developing a co-creation activity, it is important to establish a clear and specific focus to ensure participant engagement while remaining open to criticism. This could include:

Table 5. Ethics framework for co-creation projects in the public sector

Co-creation challenges identified	IAP2 Ethics Framework	Instruments and actions for research ethics	Dimensions of an ethics framework for co-creation
(1) Ensuring inclusiveness and considering stakeholder participation and input	Role of practitioner	Informed consent document Ensure policy maker’s support	<i>Practitioners in charge of co-creation processes must ensure that stakeholders' contribution will take into consideration;</i>
	Purpose	Informed consent document	<i>Clearly define the goals of co-creation;</i>
	Access to the process	Promoting stakeholder engagement, including one-to-one interactions with stakeholders	<i>All stakeholders must have equal access to co-creation spaces;</i>
	Role of the public	Informed consent document Promoting stakeholder engagement	<i>Roles of the stakeholders in the decision-making process must be clearly defined;</i>
	Support of the practice	Sharing good practices	<i>To enable and promote co-creation when is possible;</i>
(2) Building trust in co-creation processes	Trust	Promoting stakeholder engagement	<i>Stakeholders must have trust in the process and other actors involved in the co-creation process;</i>
(3) Ensuring user privacy and data security	Respect for communities	Informed consent document Data management plan Identification of stakeholders Attention to diversity of participants	<i>Co-creation activities need to include many types of stakeholders with different backgrounds, skills and expertise to foster a continuous and pluralistic exchange during the co-creation activities;</i>
(4) Specific target audience’ needs	Openness	Data management plan Anonymisation measures Preventing biased information	<i>All information relevant to the co-creation processes must be available, allowing participants to understand the process and make informed decisions;</i>
(5) Preventing biased use of user inputs and biased responses	Commitments	Informed consent document Preventing biased information	<i>It is ensured that all commitments are made in good faith;</i>
	Advocacy	Informed consent document continuous identification of stakeholders Promoting stakeholder engagement Preventing biased information	<i>Co-creation process will respect stakeholders and processes without favouring any group or interest;</i>

- demonstrating how the new service will improve data input and management;
- highlighting how the process will achieve more than current methods;
- helping to reduce undesirable practices; and
- leading to the development of common reporting mechanisms.

Regular co-creation activities are essential for maintaining stakeholder engagement. Adopting a “meet-in-the-middle” approach for defining the objectives of the co-creation activity is beneficial, where both organisers and participants share and discuss their perspectives to arrive at a mutually agreed-upon goal. Hands-on activities are particularly engaging, but online activities are better suited for small groups of participants and facilitate the easy participation of those from other locations, as they eliminate the need to commute. On-site activities are more suitable for larger groups, where participants tend to be more involved and active. Accessible spaces for people with physical disabilities and elderly people should also be considered, such as lifts for wheelchair users, as well as the provision of interpreters. Also, the availability of translators should be ensured if foreign participants who do not speak the native language are involved. These activities should focus on scenarios that are of mutual interest to both organisers and participants, particularly by using existing cases or scenarios. Participants should be informed of activities well in advance. Pre-reading material and an information session help participants understand the scope of the activity and the expected outcomes but also provide an opportunity to reinforce the roles and agreements outlined in the consent form. Additionally, recordings and transcripts, feedback measures, such as questionnaires, should be considered if the project involves many stakeholders. The second ethical challenge, *building trust in co-creation processes* requires communication. The involvement of highly prestigious institutions or roles (e.g. a Data Protection Officer) can be beneficial to increase trust and accelerate co-creation processes and agreements. Establishing communication channels, such as social media platforms or mailing lists, is beneficial for consistently collecting feedback and sharing results. A top-down commitment strategy – first securing the involvement of important or prominent stakeholders – can help to encourage the commitment of others. Engaging public sector employees can also be challenging, as they may be reluctant to accept responsibilities beyond their usual scope of activities. Some actions to ensure the engagement of public sector employees include showing what they will gain from the project, how their feedback is being used, provide training and capacity building and ensure political commitment and clear mandates.

Ensuring user privacy and data security can be achieved by using, for example, data management plans (DMPs) or contractual documents between the co-creation activity provider and the participants that specifically govern how data collected is handled within co-creation processes. This includes both the data generated during the co-creation process (meeting minutes, workshop results) and any information from various stakeholders that may be necessary for designing the policy or public service. They protect stakeholder information by clearly defining the conditions under which information will be stored, used, analysed and shared during and after the co-creation activity, thereby fostering trust and cooperation and thus are particularly valuable in situations where legal support for interoperability is lacking and where mistrust between stakeholders leads to reluctance in sharing information. DMPs can vary according to the co-creation project and ensure genuine consent, meaning that all parties fully understand the aspects of data management relevant to them. Good practices include clearly stating:

- what kind of information is stored and where;
- the reasons for storing this information;

- how parties can exercise control over their data;
- which parties have or may have access to it; and
- additionally, any tool circulated during the co-creation activity to collect feedback that contains sensitive information should be accompanied by a relevant consent form for the participant.

All information relevant to the co-creation processes must be available which help *meet specific target audience' needs* but also ensure that they understand the process and are able to make informed decisions. However, participants in co-creation activities are susceptible to producing and receiving mis- or dis information, which can affect the co-creation process and outcome. *Preventing the biased use of user inputs and biased responses* can result from insufficient information or from a dominant perspective within the project and can be mitigated by continually identifying and involving diverse stakeholders, verifying all sources and cross-checking data to ensure the most accurate information possible is used.

The aim of the study was to identify dimensions that contribute to an ethics framework for public sector co-creation and the instruments or actions necessary to address these dimensions. The results from this study highlight the need for an ethics co-creation framework provided at the start of the project that is able to support the implementation of the co-creation process in different contexts. An ethics framework for co-creation must be flexible and be able to address diverse issues that vary according to public service, policy being developed and local context. Ethical instruments and actions provided by the European Commission ([European Commission, 2013](#)) and the International Association for Public Participation's Code of Ethics ([IAP2, 2026](#)) can be used to help guide PSOs implement, guide and promote their co-creation project, in particular the identification of stakeholders. On the basis of these guidelines and the results from this study, we suggest ten key principles for an ethics framework for co-creation in the public sector:

- (1) Purpose: Clearly define the goals of co-creation;
- (2) Role of the practitioner: Practitioners in charge of co-creation processes must ensure that stakeholder's contribution will be taken into consideration;
- (3) Trust: Stakeholders must have trust in the process, other actors involved and data management during the co-creation process;
- (4) Role of the public: Roles of the stakeholders in the decision-making process must be clearly defined;
- (5) Openness: All information relevant to the co-creation processes must be available, allowing participants to understand the process and make informed decisions;
- (6) Access to the process: All stakeholders must have equal access to co-creation phases;
- (7) Respect for communities: Co-creation activities need to include many types of stakeholders with different backgrounds, skills and expertise to foster a continuous and pluralistic exchange during the co-creation activities;
- (8) Advocacy: Co-creation process will respect stakeholders and processes without favouring any group or interest;
- (9) Commitments: It is ensured that all commitments are made in good faith; and
- (10) Support the practice: To enable and promote co-creation when is possible.

7. Conclusion and future research

The aim of this paper is to develop a framework for ethical co-creation in the public sector. The empirical results and the framework proposed could assist PSOs implement co-creation and address ethics risks and thus contributes to the literature on co-creation, and particularly, the ethics relevant to co-creation. In addition, this paper presents actions and instruments that could support compliance with the ten ethical dimensions identified in co-creation processes ethical principles grounded in empirical evidence. The ethical framework for co-creation projects presented in this paper comprises the following dimensions: purpose, role of the practitioner, trust, role of the public, openness, access to the process, respect for communities, advocacy, commitments and support of the practice. In future, this framework could be empirically assessed or extended to consider other ethics risks or dimensions. In addition, ethics experts could be included in the assessment of the ethical aspects of co-creation. If the use of co-creation in the public sector is to be increased, then co-creation competences need to be included in the curriculum of public administration teaching programmes, and these should include knowledge about ethics.

The study has the advantage that it used several research methods to collect and triangulate the data collected from pilots conducted in the public sector. There are some limitations. Firstly, the results draw on four pilots only. Secondly, the results highlight some of ethical challenges that need to be studied in more depth: the issue of power dynamics and power asymmetry, which may occur when some participants possess or have access to more resources or influence than others, and the impact of bias inherent when using AI. Both power dynamics and bias in AI should be investigated more extensively in future research on the use of co-creation in the public sector.

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