



**BUNDESVERBAND
NORDISCHES
MODELL**

Zur Umsetzung des
Gleichstellungsmodells
in Deutschland e.V.

Comments

**on the state report on the implementation of the
Committee of the Parties' recommendations**

(Published on 4 December 2025)

**Convention on Preventing and Combating Violence
against Women and Domestic Violence**

March 2026

Our Members



List of Members// As of March 2026

AGGB - Aktionsgruppe Gleichstellung Bayern
Arbeitskreis Prostitution/Nordisches Modell der FU des Landesverbandes Braunschweig
Arbeitskreis Stop Sexkauf Durlach
Arbeitskreis Stop Sexkauf München
AUGSBURGER/INNEN GEGEN MENSCHENHANDEL e.V., Augsburg
Blickfeld Menschenhandel e.V.
Bündnis Frauenrechte Bayern
Bündnis NRW pro NM
Bremer Netzwerk: Sexkauf Nein!
End Demand Switzerland
Feministische Partei DIE FRAUEN
Feministisches Bündnis Heidelberg
Frauenheldinnen e.V.
Frauenzentrale Zürich
free4future e.V.
Freiheit für Frauen gUG
Hadassah Initiative féminine gUG
Initiative STOPP Sexkauf
KARO e.V.
Katholische Frauengemeinschaft Deutschlands (kfd) Diözesanverband Aachen e. V.
Kofra e.V.
Landesfrauenrat Baden-Württemberg
Leben in Freiheit e.V.
Ludwigsburger Bündnis gegen Menschenhandel und IZwangs-I Prostitution e.V.
NetzwerkBplus
Netzwerk Frauenrechte e.V.
NEUSTART e.V., Berlin
Ostalb BÜNDNIS gegen Menschenhandel und (Zwangs-)Prostitution
Reutlinger Bündnis für das nordische Modell gegen Menschenhandel & (Zwangs-) Prostitution
Rosenheim gegen Gewalt an Frauen, gegen Prostitution (Prostitution ist Gewalt an Frauen) und gegen Menschenhandel - RoNoPro
SISTERS Für den Ausstieg aus der Prostitution e.V., Stuttgart
SOLWODI Deutschland e.V., Koblenz
Soroptimistinnen Esslingen
SPD Netzwerk pro Sexkaufverbot
Terre des Femmes Österreich
Unabhängige Frauen Fürth e.V.
Verein Feministischer Diskurs Wien
Windrose e.V., Düsseldorf
Zéro Macho e.V.

Coordination and Editing

These comments on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence was submitted by the Board of the Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e.V. (BVNM) to GREVIO, the monitoring body of the Council of Europe, in its English version on 21st March 2026.

Board of the BVNM:

Simone Kleinert, Marie Kaltenbach, Ina Hansmann

Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e.V.

(Bundesverband Nordisches Modell - zur Umsetzung des Gleichstellungsmodells in Deutschland e.V.)

Prenzlauer Allee 186
10405 Berlin

info@bundesverband-nordischesmodell.de

<https://www.bundesverband-nordischesmodell.de/>

VR 40848 B I Amtsgericht Berlin Charlottenburg

I.Introduction	2
II.GREVIO recommendation No. 17 require taking remedial action by Germany in the near future	3
Rec. 17a Strengthening national strategies and measures for women in prostitution	3
a) Response I. 1.1: no national strategy to prevent and combat violence against women in prostitution.....	3
b) Response I. 2.1: no measures to prevent and combat violence against women in prostitution	4
c) 0.82.....	5
Rec. 17b Integrate the perspective of women in prostitution	5
a) Our Remarks to GREVIO and the Committee of the Parties	5
b) 17.....	6
Rec. 17c Raise awareness of women in prostitution about their rights to protection and support services	6
a) Gaps in State Reporting	6
b) Findings from the KFN Evaluation of the Prostitutes Protection Act (ProstSchG)	6
c) Legislative Deficiencies in Mandatory Counselling (§ 7 ProstSchG).....	7
d) 'Inherent Risk' or Victim Blaming?	7
Rec. 17d Improve accessibility to protection and support services for women in prostitution.....	8
Rec. 17e Research into the violence experienced by women in prostitution.....	8
a) KFN Evaluation of the Prostitutes Protection Act – Final Report.....	8
b) KFN Evaluation of the Prostitutes Protection Act – Expert opinion on the voluntariness of prostitution.....	9
III.Final Remarks and Summary of Recommendations.....	11
IV.Appendix Sexbuyer-Forums.....	12

Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e. V.

The Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e.V. (BVNM) was founded in October 2023 and operates nationwide. It currently represents 41 organizations, networks, and initiatives, as well as supporting members from civil society and from European, federal, and local politics. The association is politically independent.

The BVNM builds on the expertise and long-standing practical experience of its members, including professionals and volunteers who support women in prostitution and those seeking to exit, while also engaging in education and public awareness. The members of the BVNM include specialized counselling centres for exit support, political groups and alliances, Christian organizations, and feminist initiatives.

Together, we advocate for people in prostitution and against the prostitution system, calling for a fundamental shift in Germany's prostitution policies through the introduction of the **Nordic Model**, also known internationally as the **Equality Model**. This approach includes:

- a) Decriminalization of people in prostitution
- b) Expansion of nationwide exit programs and comprehensive support services
- c) Protection and assistance for those affected
- d) Education and prevention work about the prostitution system
- e) Criminalization of exploiters such as sex buyers, pimps, brothel operators, and traffickers— independent of victim testimony

The BVNM continues the work of its predecessor, the Alliance for the Nordic Model.

I. Introduction

We thank the Secretariat of the Istanbul Convention for the invitation to review and comment on [Germany's report on the implementation of the Committee of the Parties' recommendations](#), received on 4 December 2025.

In its [shadow report of 9th September 2021](#), our predecessor organisation highlighted the violence that women¹ continue to experience in the context of prostitution in Germany, despite the Prostitution Acts of 2002 and 2016. These laws aimed to combat crimes associated with prostitution, such as human trafficking, violence and exploitation of women, and pimping. However, the intended impact of these laws is not discernible. For more information we refer to [our shadow report to the 1st thematic evaluation round](#) submitted by the BVNM to GREVIO in October 2025. What is certain, however, is that the legislation in most other countries at least does not fuel the demand for prostitution, which is a root cause of violence against women in this sector. The purchase of sex also fosters conditions that are foundational to all forms of violence against women. Furthermore, the purchase of sex is a causal factor for indirect victims, affected family members, and professionals suffering from vicarious trauma or secondary traumatic stress.

The obligation of the state parties to report is limited to those specifically outlined in section A of the recommendation namely: a) all the proposals and suggestions formulated by GREVIO throughout the report which require immediate action – these are qualified by the use of the verb “urge”, and b) the

¹ Prostitution is primarily a form of gender-based violence against women, which is why our focus lies here. The measures to be taken should, of course, also protect and support other persons in prostitution.

proposals and suggestions related to Chapters I and II of the convention **which require taking remedial action in the near future** and are qualified by the use of the expression “strongly encourage”.

The latter is the case with **recommendation No. 17**, section I C 2 formulated in the [Baseline evaluation report by GREVIO](#), published on 7 October 2022, concerning article 4.

II. GREVIO recommendation No. 17 require taking remedial action by Germany in the near future

The following proposals and suggestions in section I C 2 “*Fundamental rights, equality, and non-discrimination (Article 4)*” require taking remedial action by Germany in the near future.

17. GREVIO strongly encourages the German authorities to:

- a. strengthen, on the basis of a national strategy or policy document, measures to prevent and combat violence that affects women who are or might be exposed to intersectional discrimination, including women with disabilities, women belonging to minority groups, migrant and asylum-seeking women, Roma women, LGBTI women, homeless women, elderly women, **women in prostitution** and women with addiction issues;
- b. integrate the perspective **of such women** into the design, implementation, monitoring and evaluation of policies for preventing and combating violence against women, by supporting, funding and closely co-operating with women’s NGOs representing them;
- c. raise the awareness of victims belonging **to these groups of women** about their rights to protection and support services;
- d. develop and improve accessibility to protection and support services **for these groups of women**;
- e. support research into the violence experienced by specific groups of women and girls at risk of or exposed to intersectional discrimination, in particular migrant/asylum-seeking women, girls and young women, homeless women, **women in prostitution**, LGBTI women and Roma women.

Our nationwide association is committed to eliminating the discrimination faced by women in prostitution, promoting gender equality, and combating the violence inherent in the system of prostitution. A further objective is crime prevention within the context of prostitution, particularly regarding human trafficking for the purpose of sexual exploitation. While we explicitly endorse GREVIO’s findings regarding all women affected by intersectional discrimination, we must therefore limit our observations to the situation of women in prostitution.

Rec. 17a Strengthening national strategies and measures for women in prostitution

a) Response I. 1.1: no national strategy to prevent and combat violence against women in prostitution

In its response dated December 4, 2025 (under I. 1.1, page 3), Germany does not mention women in prostitution. The mentioned first ‘[Federal Government Strategy for the Prevention and Combating of Violence against Women and Domestic Violence based on the Istanbul Convention 2025 – 2030](#)’ does not contain the strategies and measures for women in prostitution explicitly requested by GREVIO. Instead, there is merely a reference to human trafficking for the purpose of sexual exploitation (page 65) and a reference to the Act Amending the Criminal Code of October 1, 2021, to improve criminal law protection against forced prostitution. Of the 120 measures listed in total, not one explicitly addresses the specific risk situation of women in prostitution, even though GREVIO had warned of an urgent need for action in this regard. In this respect, it cannot be described as a ‘comprehensive strategy.’

To what extent the 16 Federal States (Bundesländer) provide for measures for women in prostitution—who are particularly affected by violence—in their State Action Plans (LAP), to which Germany also refers in this context, could not be verified by us. Under point 1.1. Germany only names women with impairments and disabilities, refugee women, LGBTIQ* individuals, and older women as particularly vulnerable groups; however, women in prostitution remain disregarded.

Furthermore, under point 1.1, Germany refers to the planned Violence Assistance Act (Gewalthilfegesetz).

§ 2 (1) of the Violence Assistance Act is now defined as follows²:

§ 2 Definitions

(1) Gender-based violence within the meaning of this Act is violence against women and thus any act of physical, sexual, or psychological violence by one or more persons that is directed against a woman because she is a woman, or that disproportionately affects women and results in, or is likely to result in, harm or suffering.

The vast majority of prostitutes are female, but boys, men and trans persons are also involved in prostitution.³ Almost 100% of all sex buyers are male.

Hence: In the context of prostitution mainly women become victim of mainly Men's violence Against Women. Although men, boys, and trans persons can also be affected.



The violence experienced by women in the context of prostitution is gender-based violence.

We ask GREVIO, in the continuation of its evaluation rounds, to consistently monitor whether and to what extent the Violence Assistance Act has actually been applied to women in prostitution.

Recommendation 1: Germany must consistently monitor whether and to what extent the Violence Assistance Act reaches women in prostitution.

b) Response I. 2.1: no measures to prevent and combat violence against women in prostitution

Under point 2.1 of its response, 4 December 2025, as well Germany does not mention violence against women in prostitution, while other groups affected by intersectionality are explicitly cited multiple times (page 4). The Federal Government's blanket assertion that all approaches within the strategy take into account the 'diverse characteristics of all women' and offer 'tailored support' highlights the core of the problem: In stark contrast to GREVIO's clear demands, Germany has evidently not yet recognized the specific needs and particular vulnerability of women in prostitution.

² <https://www.gesetze-im-internet.de/gewhg/BJNR0390B0025.html>

³ Bundesministerium für Familie Senioren Frauen und Jugend
<https://www.bmfsfj.de/bmfsfj/themen/gleichstellung/frauen-vor-gewalt-schuetzen/prostituiertenschutzgesetz/gesetzliche-regelungen-80646>

c) 0.82

Since 2017, Germany has granted official 'permits to operate a prostitution business' under §§ 12 ff. ProstSchG. In June 2025, the Criminological Research Institute of Lower Saxony (KFN) presented its evaluation of the ProstSchG to the Ministry for Family Affairs.⁴ The KFN Evaluation of the ProstSchG states:⁵

'For prostitution premises, it was calculated (with certain margins of error) that 0.82 inspections per business were carried out in 2024. This essentially aligns with the guidelines existing in some federal states, which stipulate that one inspection should take place every 18 months. Whether this inspection frequency is sufficient cannot be conclusively assessed here.'

75.3% of authority staff spoke in favour of more frequent inspections. The low inspection rate proves that the promised state control cannot be effectively provided and does not align with a credible national strategy to prevent and combat violence against women in prostitution. Legalization has created legal facades behind which exploitation remains invisible.

Recommendation 2: Germany must prohibit the operation of prostitution premises. The resources currently tied up in administration must be consistently reinvested into sustainable exit programs.

Rec. 17b Integrate the perspective of women in prostitution

We greatly appreciate GREVIO's recommendation on this matter. We strongly support the integration of the perspectives of women in prostitution into future reporting. To ensure these perspectives are both authentic and methodologically sound, a more nuanced approach is required. The following sections outline why it is crucial to differentiate between various groups within the system (Part a) and why current evaluation efforts in Germany fail to provide a sufficiently robust empirical basis for such an integration (Part b).

a) Our Remarks to GREVIO and the Committee of the Parties

GREVIO has explicitly acknowledged the situation of women in prostitution. This is highly relevant for our work as well as for the work of our members. Explicit references to women in prostitution in GREVIO's future reports and questionnaires and in the Committee of the Parties' recommendations and questionnaires are therefore of substantial importance to our advocacy efforts.

It is essential to differentiate further, as there is no single, homogenous group of women in prostitution. Among the various groups one could distinguish, we find the following classification particularly effective regarding the topic of prostitution:

persons with a vested interest in the continued existence of the system	persons who have exited or intend to exit the system
---	--

It is particularly valuable and essential to draw on the expertise of women who have exited prostitution. Unlike women currently in prostitution, survivors of prostitution can reflect on their experiences, speak openly about long-term impacts, risks, and exploitative mechanisms, without their statements being shaped

⁴ The KFN Evaluation consists of a final report and two expert assessments (a supporting assessment on 'Voluntariness in Prostitution' and a supporting assessment on the "Prostitutes Protection Act and Building Law"). <https://www.bmbfsfj.bund.de/bmbfsfj/service/publikationen/evaluation-des-gesetzes-zur-regulierung-des-prostitutionsgewerbes-sowie-zum-schutz-von-in-der-prostitution-taetigen-personen-prostituiertenschutzgesetz-prostschg--266228> (KFN Evaluation)

⁵ KFN Evaluation 2025 page 394

by immediate survival strategies or financial dependency. This perspective therefore provides especially reliable and in-depth insights that are indispensable for developing effective measures and recommendations.

In addition, we refer to our [shadow report from October 2025 to the 1st thematic evaluation round](#), article 7, answer to question 1 second sentence: Measures that have not been addressed, page 6-7.

Recommendation 3: Integrate expertise and perspective of survivors of prostitution

Recommendation 4: Explicit reference to women in prostitution in future reports

b) 17

Within a three-year evaluation period, the commissioned evaluators of the KFN Evaluation apparently only managed to **interview 17 individuals active in prostitution** in the data collection method of qualitative expert interviews.⁶ This raises significant methodological questions regarding the reliability and representativeness of the findings obtained (although the evaluators openly admit that the study is not representative, it currently serves as the basis for the expert commission). Given the scale and heterogeneity of the prostitution market in Germany, the KFN Evaluation seems hardly suitable for making viable statements about the effectiveness of a nationwide prostitution regime.

Rec. 17c Raise awareness of women in prostitution about their rights to protection and support services

a) Gaps in State Reporting

The official questionnaire dated 3rd June 2025 does not include specific questions regarding this complex of issues. Consequently, it is not possible for us to directly comment on the Federal Government's response in this regard.

b) Findings from the KFN Evaluation of the Prostitutes Protection Act (ProstSchG)

The KFN Evaluation of the ProstSchG conducted by the KFN did not examine state measures for awareness-raising; however, it provides evidence regarding the situation of those affected. Despite the widely criticized methodology of the KFN Evaluation, we wish to direct GREVIO and the Committee to the relevant sections of the 640-page report:

- **Cluster Analysis (from p. 549):** Examination of thematic areas such as 'Legal Knowledge' (Point 3), 'Trust in German Authorities' (Point 4), and 'Trust in the German Police' (Point 5).
- **Explanation of Results (from p. 556):** These data illustrate the deficits in legal knowledge and the lack of trust in state protection institutions.

⁶ KFN Evaluation, table 1, page 80

c) Legislative Deficiencies in Mandatory Counselling (§ 7 ProstSchG)

The information requirements within the registration process (§ 7 Para. 2 ProstSchG) are insufficient. While the provision of information on the accessibility of emergency services and general legal frameworks (No. 1) is stipulated, there is a total lack of **explicit counselling regarding rights as a victim of crime**.

- **Registered Persons:** Even for this group, the recommendation for comprehensive legal awareness-raising has not been implemented.
- **Unregistered Persons:** For individuals working in the shadows or those unable to register, no state-governed outreach or information takes place. In this case, the recommendation remains entirely disregarded.

d) 'Inherent Risk' or Victim Blaming?

A specifically German problem is the legal classification of prostitution as an 'inherently risky activity' (*gefahr geneigte Tätigkeit*).⁷ This classification carries a massive risk of misappropriation:

- Those affected tend to misinterpret experienced violence as a 'professional risk' inherent to the job.
- This leads to dangerous **victim blaming**, where victims believe they are 'to blame' for the violence they have suffered.

1) Individuals in prostitution act primarily with the goal of obtaining money. 2) The hazards and risks associated with prostitution are not within the sphere of influence of the person in prostitution. Instead, they originate from the criminal acts of third parties, which constitute men's violence against women.	Protection Against Perpetrators in Prostitution Pimps Human Traffickers Exploiters (Charging usurious prices) Sex Buyers with STIs Sexual Coercion by Clients Violent Clients Insults and Verbal Abuse Blackmail and Extortion Other Forms of Coercion Etc. 
--	---

In the context of prostitution, the vast majority of those affected by male violence are women. They cannot be held responsible for the male violence inflicted upon them. Therefore, the BVNM warns against a misinterpretation of the classification of prostitution as an 'inherently risky activity' (*gefahr geneigte Tätigkeit*). Individuals in prostitution expressly do not 'accept' or 'consent to' becoming victims of crime as a trade-off for their activity. Such an interpretation would shift responsibility away from the perpetrator and onto the victim. Furthermore, it hinders the ability of victims of crime to recognize themselves as such (victim awareness).

Recommendation 5: Germany must communicate much more clearly that men's violence in prostitution is never legitimate and that those affected—regardless of their occupation—never bear the blame for crimes committed against them.

⁷ Explanatory Memorandum to the Draft Prostitute Protection Act, BT-Drs. 18/8556, S. 35
<https://dserver.bundestag.de/btd/18/085/1808556.pdf>.

Rec. 17d Improve accessibility to protection and support services for women in prostitution

The questionnaire from 3rd June 2025 does not include specific questions on this topic. Hence, we cannot comment on Germany's response.

This point was also examined during the KFN Evaluation of the ProstSchG, though more qualitatively than quantitatively. In our view, the KFN Evaluation reveals a drastic systemic failure: while privileged groups find their way into the support system, particularly vulnerable women remain effectively excluded.⁸ Consequently, the system primarily protects those who already possess their own resources, thereby failing its state mandate of protection.

This failure is exacerbated by the increasing shift of prostitution into the digital space, where many monitoring authorities are already failing due to their own inadequate IT infrastructure.⁹

Germany can no longer ignore this systemic failure; it cannot be remedied by mere 'adjustments' to the Prostitute Protection Act. As long as Germany continues to sanction the purchase of sex, it tacitly accepts the systemic violation of the sexual self-determination of these vulnerable groups. Therefore, a consistent response to this state failure can only be the introduction of a general criminalization of sex purchase.

Recommendation 6: Germany must recognize that the ProstSchG cannot bridge the systemic gap in protecting vulnerable women. Beyond technical or digital adjustments, the state must address the root cause by ending the legalization of sex purchase.

Rec. 17e Research into the violence experienced by women in prostitution

a) KFN Evaluation of the Prostitutes Protection Act – Final Report

In June 2025, the KFN presented its evaluation of the ProstSchG to the Ministry for Family Affairs.¹⁰ The KFN carried out the evaluation between 1 July 2022 and 1 April 2025 in cooperation with three subcontractors.¹¹

The KFN Evaluation addresses 'Violence and the experience of crime by prostitutes in Germany' on page 39. It cites the 2004 study by Schröttle and Müller.¹² This study on the living conditions and health of women in Germany, which also surveyed prostitutes, found that the health status of prostitutes is significantly poorer and that their exposure to various forms of violence is significantly higher than that of the average female population.¹³ More recent investigations focusing on the violence experienced by women in prostitution, that do not concern human trafficking and exploitation, have not been commissioned. The KFN recommendation 39 states: 'It is recommended to commission a research project to develop an instrument for identifying

⁸ KFN Evaluation, page 565

⁹ KFN Evaluation, page 395

¹⁰ Final Report <https://www.bmbfsfj.bund.de/resource/blob/266220/48609c967693e7454e58950a6fa43cdb/evaluation-prostituiertenschutzgesetz-abschlussbericht-data.pdf>

¹¹ The KFN Evaluation consists of a final report and two expert opinions (supporting expert opinion on 'Voluntariness in Prostitution' and supporting expert opinion on the 'Prostitution Protection Act and Building Law

<https://www.bmbfsfj.bund.de/resource/blob/266222/ea8784deb9facce667614f8da1fea49f/evaluation-prostschg-gutachten-freiwilligkeit-in-der-prostitution-data.pdf>

<https://www.bmbfsfj.bund.de/resource/blob/266226/31d9c22bd214afe53fb03c99138d36be/evaluation-prostschg-gutachten-prostschg-und-baurecht-data.pdf>

¹² Schröttle, M./Müller, U. (2004), Lebenssituation, Sicherheit und Gesundheit von Frauen in Deutschland. II. Teilpopulationen – Erhebung bei Prostituierten.

¹³ Schröttle, Monika & Müller, Ursula (2004): Lebenssituation, Sicherheit und Gesundheit von Frauen in Deutschland. II. Teilpopulationen – Erhebung bei Prostituierten, S. 60 ff; S. 67 ff.

victims of prostitution-specific crime.’¹⁴ The results of the KFN's own surveys are not conclusive regarding the violence experienced by women in prostitution. The KFN Evaluation has received much criticism. For more details we refer to our [shadow report from October 2025 to the 1st thematic evaluation round](#), article 11, page 10.

b) KFN Evaluation of the Prostitutes Protection Act – Expert opinion on the voluntariness of prostitution

As part of the KFN Evaluation of the Prostitutes Protection Act, an expert opinion on the voluntariness of prostitution was commissioned.¹⁵

This report was compiled with legal and medical expertise. The various requirements for free will in the context of prostitution were developed in the 'Expert Opinion on Voluntariness' (Freiwilligkeitsgutachten), whereby freedom from coercion is only one aspect among others (the power of disposition, the capacity for self-determination, and the sense of reality).

We would particularly like to emphasize the 'sense of reality' (Realitätsbezug), regarding which the expert opinion highlights essential points. We urge GREVIO and the Committee of the Parties to pay close attention to the adherence to these points in the future.’

‘A prerequisite for a free and self-determined decision is the knowledge of all circumstances relevant to that decision (see Section C.V.). Therefore, the exercise of the right to self-determination in the context of prostitution also requires informed consent based on the knowledge of all relevant circumstances.’

(...)

‘Within this framework, comprehensive information must be provided regarding the activity of prostitution, such as its risks. In this regard, it is recommended to align with the established rules governing medical interventions.’

page 83

Prostitution that occurs without proper informed consent is not considered voluntary according to the standards established within the German legal system. Consequently, in such cases, sex buyers violate the sexual self-determination of women in prostitution.

The expert opinion also emphasizes the requirement of 'freedom of choice' (Wahlmöglichkeit).

‘Self-determination, therefore, is only ever an option if the person affected has 'another choice' in the specific situation – meaning the possibility to have made a different decision.’ **page 57**

(...)

‘Drawing on the obligation to provide information about alternative treatments in the case of medical interventions, it is also conceivable to include information on professional alternatives within the framework of an 'extended' counselling session. While these cannot culminate in comprehensive career counselling, they can serve as a basis for an independent assessment of available options.’ **page 84**

Regardless of age, a sense of reality will be lacking in all persons who do not regularly participate in the proposed 'extended counselling session' and who are unable to implement its contents and available options in every single act of prostitution. The expert opinion dispels the misconception that one must

¹⁴ KFN Evaluation Final Report, page 604

¹⁵ <https://www.bmbfsfj.bund.de/resource/blob/266222/ea8784deb9facce667614f8da1fea49f/evaluation-prostschg-gutachten-freiwilligkeit-in-der-prostitution-data.pdf>

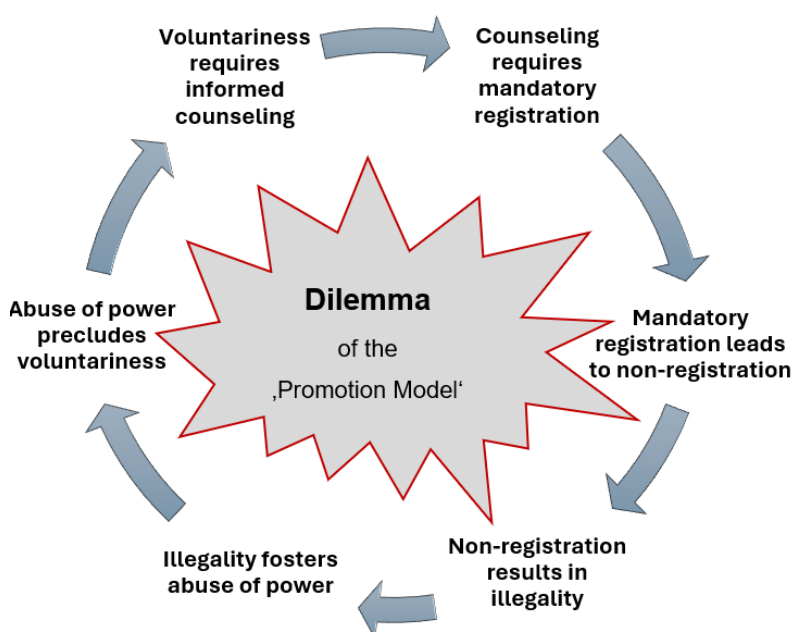
distinguish between voluntary prostitution on the one hand and human trafficking or forced prostitution on the other, under the assumption that the latter is already a criminal offense. It demonstrates that even without legally relevant coercion, women can find themselves in situations where a free decision is no longer possible. According to the expert opinion, voluntariness requires proper informed consent.

It is in fact impossible and illusory to ensure that every person in prostitution receives adequate and appropriate counselling. The 2025 report by the Istanbul Convention Alliance (BIK) confirms that registration has continuously declined.¹⁶

State-sponsored 'two-tier society' in prostitution	
Those „properly" informed with registration Prerequisite for voluntariness  'State-sponsored'	Those not informed or wrongly informed  State acquiescence to involuntariness

This creates a two-tier society: those who are registered and those driven underground, where non-registration leads to increased abuse of power, exploitation, and violence. This finding was also emphasized by the BIK in its report.¹⁷

If we accept that the most vulnerable groups thus 'fall through the cracks', adhering to the ProstSchG represents a dangerous shift toward systemic selection. However, we draw a different conclusion than the BIK: The solution cannot be to abolish the registration and thus sacrifice the principle of informed consent (Aufklärung). This is the fundamental dilemma of the German prostitution laws: without registration, there is no counselling; without counselling, there is no voluntariness.



¹⁶ Alternative Report Istanbul Convention Alliance, October 2025, page 24

¹⁷ See above

III. Final Remarks and Summary of Recommendations

The sheer volume of KFN Evaluation recommendations for revising the ProstSchG (46 PLUS 18!) is an indication of its failure and reveals a fundamental systemic problem. In light of this structural failure, Germany must finally move away from the 'Promotion Model'¹⁸ and implement the Nordic Model. The Nordic Model is the best path to implement the Convention on Preventing and Combating Violence against all Women and Domestic Violence in Germany.

Prohibitionist Model <u>reduces:</u> • Number of those affected • Demand • Human trafficking for sexual exploitation • Gender-based violence in the context of prostitution • Secondary traumatization of professionals • Indirect impact and secondary traumatization of family members • Gender stereotypes • Objectification of women • Sexism extreme prohibition	Nordic Model  middle ground	„Promotion Model ‘ <u>promotes:</u> • Number of those affected • Demand • Human trafficking for sexual exploitation • Gender-based violence in the context of prostitution • Secondary traumatization of professionals • Indirect impact and secondary traumatization of family members • Gender stereotypes • Objectification of women • Sexism extreme promotion
Criminalization of supply	No criminalization of supply	Promotion of supply, issuance of official "prostitute ID cards"
Ban on brothels etc.	Ban on brothels etc.	Promotion of brothels, issuance of permits for prostitution premises
Criminalization of demand	Criminalization of demand	Promotion of demand

Recommendation 1: Germany must consistently monitor whether and to what extent the Violence Assistance Act reaches women in prostitution.

Recommendation 2: Germany must prohibit the operation of prostitution premises. The resources currently tied up in administration must be consistently reinvested into sustainable exit programs.

Recommendation 3: Integrate expertise and perspective of survivors of prostitution

Recommendation 4: Explicit reference to women in prostitution in future reports

Recommendation 5: Germany must communicate much more clearly that men's violence in prostitution is never legitimate and that those affected—regardless of their occupation—never bear the blame for crimes committed against them.

Recommendation 6: Germany must recognize that the ProstSchG cannot bridge the systemic gap in protecting vulnerable women. Beyond technical or digital adjustments, the state must address the root cause by ending the legalization of sex purchase.

¹⁸ „Promotion Model‘, also known as regulatory approach. It promotes number of those affected, demand, human trafficking for sexual exploitation, gender-based violence in the context of prostitution, secondary traumatization of professionals, indirect impact and secondary traumatization of family members, gender stereotypes, objectification of women, sexism, etc.

IV. Appendix Sexbuyer-Forums

The objectification of women continues in punters' forums. These are websites where punters exchange information about brothels, escort agencies and very specifically about individual women, evaluate them (e.g. narrowness of the orifices, enthusiasm). Often there are extremely discriminatory, violent, insulting or objectifying descriptions that are deeply misogynistic, racist, sexist, inhuman and trivializing violence.¹⁹

'She is constantly freezing, which isn't surprising—she's nothing but skin and bones. Met her at the hotel today; had to wait again because she still had a client. Just as I was about to leave—we actually wanted to go to the PK [Puffklub]—she messaged me. Neither of them were fully dressed when I knocked on the room door; had to wait a moment longer, then he pushed past me. Whether it was really a client or a pimp or whatever, in any case, he was still in front of the hotel 50 minutes later...'

(Source: ao-huren, 11.03.2026, 21:29)

'If you start worrying about the feelings of whores, you'd better just stay at home....'

(Source: ao-huren, 13.01.2026, 09:59)

'I only get a bad conscience when I've burned money on trashy service or getting ripped off. Why should I care how a whore feels? If she were doing it voluntarily, she wouldn't need to do the job.'

(Source: ao-huren, 13.01.2026, 06:56)

'...Price doesn't always reflect quality, which I've noticed especially with German whores, as they have a literal fee schedule for every extra; that's what's kept me from messaging German women in the trade since then. Meanwhile, in Hamburg, it's also become common among some Asian whores to charge an extra fee for AO (unprotected sex) or anal, and I don't do that anymore because it doesn't make the service any better. I am booking a service, not buying a car with various extras; if I specifically ask for AO, I expect the same performance as if I have to put a rubber on. Look, the ladies get paid so we can release our pressure, and I expect it to come across with at least some credibility, even if it's faked—because if I'm not satisfied, I'll go elsewhere. Her feelings during this are irrelevant to me; if they were, I'd have to avoid Pay6 and do everything by hand.' (Source: ao-huren, 15.01.2026, 15:38)

'...Must say, so far the best Asian girl I know. Usually, the photos don't match the person in the apartment anyway.' (Source: ao-huren, 14.01.2026, 14:47)

'Came back, panties off, and then kneeling on the bed as if to say 'let's get this over with.' I asked 'Anal OK?' and she just went 'no, broken.' After some arguing, it was apparently OK after all. Since I wasn't really in the mood yet, she was supposed to blow me first. After more arguing, she finally did it.'

(Source: ao-huren, 03.10.2025, 23:42)

'I was with her yesterday and strongly assume she is pregnant. She has very large suction nipples and her belly is round as a ball. The rest of her is normal. When I asked if she was pregnant, she didn't want to address it. When I went into the room with her, I already noticed she wasn't acting normally. Everything was okay, except that she seemed dazed and not really there. During sex, she let everything happen. She just lay there, dazed and out of it, picked her nose, played with her nipples as if in slow motion. I think she had taken something. In exchange, I could do whatever I wanted to her.' (Source: ao-huren, 16.11.2025, 10:22)

¹⁹ <https://dieunsichtbarenmaenner.wordpress.com/tag/sex-buyer/>



BUNDESVERBAND NORDISCHES MODELL

Zur Umsetzung des
Gleichstellungsmodells
in Deutschland e.V.