



**Comments submitted by Germany
on GREVIO's final report on the implementation
of the Council of Europe Convention
on preventing and combating violence
against women and domestic violence
(Baseline Report)**

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Comments to the GREVIO report by the German Federal Government

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Introduction

With the ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), Germany has committed itself at all levels of government to do everything necessary to combat violence against women and domestic violence, to offer protection and support to those affected and to prevent violence through legislative and other measures. Accordingly, it is applied equally at the level of the federal government, the Länder and the municipalities. Due to the federal system, the main responsibility for the establishment and further development as well as the financing of the help and support system for women affected by violence lies with the Länder. Wherever possible, the Federal Government provides support within the framework of constitutional responsibilities and available financial resources.

The GREVIO monitoring process, which was started in Germany in 2020 and is now being concluded in 2022 with GREVIO's final report, has been an enriching experience for the German government. Germany welcomes the thorough analysis of the current state of implementation of the Istanbul Convention and the useful guidelines for further improvements. The Istanbul Convention is rightfully called the Gold Standard for protecting women and girls from violence and the German government is dedicated to fully implementing it throughout the country.

In the new legislative period, which started on 26th October 2021, the Federal Government has undertaken a great deal to decisively advance the protection of women from violence and the implementation of the Istanbul Convention at the federal level. The mandates from the coalition agreement are to be understood as an overall package for the implementation of the Istanbul Convention. The upcoming measures take intersectionality into account, meaning that the needs of LGBTIQ* women, migrant women and women with disabilities are specifically considered.

These measures include, on the one hand, the establishment of an independent national monitoring body. Since February 2020, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) has been funding a project at the German Institute for Human Rights (DIMR) that aims to develop a concept for independent reporting bodies on gender-based violence and human trafficking. Other projects include the establishment of a national co-ordinating body and the development of an overall inter-ministerial political strategy to prevent and combat gender-based violence against women and domestic violence. Furthermore, the coalition partners have anchored the introduction of a uniform federal legal framework for reliable funding of women's shelters in the coalition agreement. The BMFSFJ is currently working on key points for internal government coordination on how to proceed.

In order to support the Länder even more in ensuring a network of support services that is as comprehensive as possible, the federal funding programme "Ending Violence against Women together" was launched, among other things. To achieve this goal, the federal funding programme "Ending Violence against Women together" has two strands: On the one hand, the federal innovation programme provides financial resources for innovative projects in order to reach all women affected by

violence and their children, and to support them in a targeted manner. On the other hand, the federal investment programme funds construction measures to expand capacities and improve access to women's shelters and specialised counselling centres. For the investment part, according to the current budget planning, a total of 150 million euros was and is available until 2024. For the non-investment part of the programme, the budget for 2022 provides 5 million euros (2019-2021; already 5 million euros each).

However, as in the past decades, the Federal Government will continue to initiate and finance measures in the thematic field of "violence against women" within the framework of federal funding competence. The further implementation of the Istanbul Convention will be a focus here and the GREVIO recommendations will work as an important guideline.

In the following chapters, the German Federal Government provides comments – where relevant – on the recommendations in the report. This means, that not all recommendations from the report are listed here. For the ones that are not included, it can be assumed that the German Federal Government duly noted the recommendation and is aiming to take them into account for future policy measures.

I. Purposes, definitions, equality and non-discrimination, general obligations

B. Scope of application of the convention and definitions (Articles 2 and 3)

1. GREVIO urges the German authorities to adopt nationwide applicable definitions of the terms set out in Article 3 of the Istanbul Convention (paragraph 10).

2. GREVIO strongly encourages the German authorities to enhance the implementation of the Istanbul Convention in relation to all forms of violence against women, beyond domestic violence and sexual violence, which are currently less addressed by policies, programmes and support services, with due regard to their gendered nature (paragraph 11).

The report mentions that there are working groups by the Conference of the Ministers of the Interior, Conference of Ministers of Justice, the Conference of Ministers of Equality and the Conference of Ministers of Integration, who are working on definitions of forms of violence against women and girls for different purposes. The learning from these working groups can feed into the definitions of the terms set out in Article 3.

The issue of nationwide applicable definitions of the terms set out in Article 3 of the Istanbul Convention will be considered as part of the upcoming work on the National Strategy to combat violence against women (see I. C. 2).

Considering that the main responsibility for providing women's support services lies with the Länder, there are already many projects that address different forms of violence against women, which go beyond domestic and sexual violence.

The scope has also been broadened in recent years at the federal level. For example, Germany is conducting a study on the phenomenon of forced marriage in 2022 - 2024. The project approaches the complexity of forced marriages scientifically by developing a definition of the phenomenon and then attempting to estimate the number of people who fall under this definition in Germany. This will provide an important empirical basis for further research on forced marriages as well as for political measures to combat them.

C. Fundamental rights, equality and non-discrimination (Article 4)

2. Intersectional discrimination

3. GREVIO strongly encourages the German authorities to (paragraph 17):

- 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.*

The Coalition Agreement for the 20th legislative period 2021-2025 provides for a national interministerial strategy against violence with focus on the prevention of violence and rights of the persons concerned. The needs of vulnerable groups such as women with disabilities, refugee women and LGBTIQ* women. The Federal Government is planning to develop such a strategy.

Considerations of the establishment of a national coordinating body are currently underway within available financial resources. The first task of the coordination office should be to develop a national interministerial strategy.

Currently, BMFSFJ is supporting the umbrella organisation of migrant women's organisations (DaMigra) through the project "Women between multiple discrimination and the right to self-determination" (co-funded by BAMF from 2019 to 2022). DaMigra has been operating as a nationwide, independent and women-specific umbrella association of migrant women's organisations since 2014. DaMigra empowers migrant and refugee women and works with an intersectional perspective. To the inside world, DaMigra works for the networking, qualification and promotion of migrant organisations. To the outside world, DaMigra bundles the interests of women with migration and refugee backgrounds in order to make them audible and visible at the federal level. Starting in October 2022 to End of 2025 BMFSFJ funds the project "#together! Solidarity against sexism and racism". In this project DaMigra works on the following topics:

- Strengthen migrant women, migrant women's organisations and networks;
- Shape social structures in an anti-racist and anti-sexist way;
- Empowering and networking women from war and crisis zones.

The Prostitute Protection Act (ProstSchG), which entered into force on 1 July 2017, aims to strengthen the sexual self-determination rights of prostitutes, create the legal conditions to ensure favourable working conditions, prevent harmful forms of prostitution and combat crimes such as human trafficking, violence, exploitation of prostitutes and pimping.

The Act (ProstSchG) provides that BMFSFJ will evaluate the effects of the Act on a scientific basis five years after its entry into force (starting in 2022), taking into account the experience of its practical application. An evaluation report must be submitted to the Parliament by 2025. The evaluation process has commenced on the 1st of July 2022, and it is focused on the experiences of persons in prostitution. This will provide an important empirical basis for the perspective of women in prostitution into the design, implementation, monitoring and evaluation of the policies for preventing and combating violence against women.

The Federal Government will also work to improve the data situation for LGBTIQ* women.

Since 2003, BMFSFJ sponsors the project "Political representation of interests of women with disabilities" in association with Weibernetz e.V. The Nationwide Network from Women, Lesbians and Girls with disabilities is a non-profit-association and has been established in 1998 by women with different disabilities and most of the federal states-networks and coordination centres of women with disabilities as a nationwide body.

II. Integrated policies and data collection

A. Comprehensive and co-ordinated policies (Article 7)

7. GREVIO – in full recognition of Germany’s constitutional requirements and sharing of competences – urges the German authorities to develop a long-term comprehensive strategy offering a state-wide effective, comprehensive and co-ordinated set of policies to prevent and combat all forms of violence covered by the Istanbul Convention, placing the rights of victims at the centre of all measures and giving due importance to the gendered nature of the different forms of such violence, including domestic violence. To this end, GREVIO urges the German authorities to (paragraph 34):

- a) strengthen and build upon the existing mechanisms aimed at improving co-ordination of activities undertaken at the different levels of government (national/federal states/municipalities) in relation to all forms of violence covered by the scope of the Istanbul Convention, with the view to establishing more structured and continuous co-operation between relevant entities;*
- b) conduct an independent comparative analysis of existing national, federal and local measures and programmes on violence against women, including domestic violence, with a view to identifying gaps, as well as promising practices that can be recommended throughout the country;*
- c) devise and implement comprehensive and holistic policies to address violence against women in all its forms and manifestations, including in their digital dimension, and in particular, domestic violence, sexual violence, stalking, sexual harassment, forced marriage, honour-related violence, forced sterilisation and forced abortion.*

The Federal, Länder and Local Authorities Round Table "Together against Violence towards Women" has proven to be an important body for constructive consultations and is to be continued at the political and expert level. The intention is to invite important non-governmental associations in the field of "protection of women from violence" to the next meeting of the political round table in order to include the expertise of civil society in the consultation processes.

See above I C 2 regarding the national interministerial strategy.

B. Financial resources (Article 8)

8. GREVIO strongly encourages the German authorities to ensure appropriate human and financial resources for any policies, measures and legislation aimed at preventing and combating violence against women and for the institutions and entities mandated with their implementation, including specialist support services provided by civil society entities, and to introduce separate budget and funding lines. Furthermore, GREVIO strongly encourages the German authorities to introduce adequate long-term funding structures for specialist service provision in order to ensure their availability and accessibility as required, as well as to conduct a gender impact assessment of the government expenditure on the policies and measures undertaken to respond to different forms of violence (paragraph 42).

The Federal Government has launched the federal programme "Ending Violence against Women together" in 2019. This consists of two parts. The strand that provides funding for innovative projects will expire - as planned - at the end of 2022. The investment strand of the federal programme, with the help of which women's shelters and women's counselling centres are being made barrier-free and structural measures for counselling and support of new target groups are being created, will run up to and including 2024 according to current budget planning. However, as in the past, the Federal Government will continue to initiate and finance measures in the thematic field of "Violence against Women" within the framework of federal funding competence. The further implementation of the Istanbul Convention will be a focus here.

Following the coalition agreement, the BMFSFJ is examining which federal legal steps are possible to secure the right to protection and counselling in cases of violence as well as to expand the support system in line with needs and with a view to reliable financing of women's shelters within the framework of constitutional responsibilities and available financial resources. The Federal Ministry for Family Affairs, Senior Citizens, Women and Youth is currently working on key points for internal government coordination on how to proceed. (See IV. F. 33 for further details).

The Länder and local authorities devote considerable funds for promoting the work of NGOs as providers of support services, and also to supporting prevention, public relations and networking (see Germany's GREVIO State Report for details).¹

C. Non-governmental organisations and civil society (Article 9)

¹ <https://www.coe.int/en/web/istanbul-convention/germany>

9. GREVIO encourages the German authorities to continue to systematically involve women's NGOs in policy making, in order to make use of their knowledge in their respective fields of expertise, while paying special attention to those that work with groups of women who are or may be exposed to intersectional discrimination, or with forms of violence that are currently less addressed in policies (paragraph 46).

The Federal Government will continue to support the work of the women support system in the following years as far as it is with the federal government's competences financially supporting the German-wide cooperation and networking sites:

- The Association of Women's Shelters (Frauenhauskoordinierung e.V./FHK) <https://www.frauenhauskoordinierung.de/>
- The Federal Association of Rape Crisis Centres and Women's Counselling Centres in Germany (bff e.V.) <https://www.frauen-gegen-gewalt.de/de/>

The federal state working group on domestic violence will continue to meet regularly. The exchange with experts in the field and the exchange of good practices an important contribution to this.

BMFSFJ is currently examining the possibility to fund the work of the German Istanbul Convention Alliance. The Alliance was founded in February 2018 and it brings together women's rights organisations and other federal associations and experts with a focus on violence against women and girls (over 20 members). The coordination office is located at the German Women's Council.

D. Co-ordinating body (Article 10)

10. GREVIO urges the German authorities to designate or establish one or more national co-ordinating bodies that are fully institutionalised and mandated to fulfil all of the functions as set out in Article 10 of the Istanbul Convention, and that are provided with the necessary financial and human resources (paragraph 49).

11. GREVIO strongly encourages the German authorities to ensure, on the one hand, the co-ordination and implementation of policies and measures to prevent and combat all forms of violence against women, and on the other hand, their independent monitoring and evaluation. In so doing, the German authorities should ensure that the functions of the co-ordinating body are exercised in close consultation with those of the other co-ordinating and monitoring bodies as well as relevant NGOs and civil society and that they are supported by adequate and appropriate data (paragraph 50).

The above-mentioned coalition agreement provides guidelines, which are to be understood as an overall package for the implementation of the Istanbul Convention and which, at the same time, build on the measures initiated in the 19th legislative term (Round Table, Federal Investment Programme "Ending Violence against Women together").

This overall package consists of establishment of an independent monitoring body on gender-based violence and a national coordinating body at the federal level as well as the development of an overall interministerial political strategy to combat gender-based violence against women and domestic violence - as structural measures at the

federal level.

Since 2020, the German Institute for Human Rights (DIMR), with funding from the BMFSFJ, has been developing an overall concept for a monitoring body against gender-based violence and a monitoring body against human trafficking. The project phase funded by the BMFSFJ ends on 31 October 2022. The aim is to make the reporting centres operational by the end of 2022.

E. Data collection and research (Article 11)

1. Administrative data collection

a. Conclusion

12. Bearing in mind the need for data collection to apply to all forms of violence covered by the Istanbul Convention, GREVIO strongly encourages the German authorities to take the necessary measures, including, if necessary, legislative amendments establishing the duty of statutory agencies to (paragraph 66):

- a. ensure that data collected by all relevant stakeholders (namely law-enforcement agencies, judicial authorities, and health and social services) are disaggregated with regard to the sex and age of the victim and the perpetrator, their relationship, geographical location and the different forms of violence covered by the Istanbul Convention, and that information on the presence of child witnesses and victims is also included;*
- b. harmonise data collection between law-enforcement agencies and the judiciary, with the aim of, inter alia, allowing the assessment of conviction and attrition rates and of recidivism rates; enabling a thorough analysis of the pathway of cases through the criminal justice system chain – law enforcement, prosecutors' offices and the courts;*
- c. harmonise data collection and analysis of cases of violence against women that have resulted in the killing of the woman and, where appropriate, children;*
- d. introduce a data-collection system that allows the recording of the number of breaches of emergency barring, restraining and protection orders, the number of sanctions imposed as a result of such breaches and the number of cases where the woman was revictimised or murdered as a consequence of such breaches;*
- e. introduce a data-collection system that allows the recording of the registration and outcomes of asylum claims made on the basis of gender-related persecution;*
- f. introduce data collection in the healthcare sector in relation to all forms of violence against women;*
- g. ensure that the process of collecting, storing and transforming collected data complies with the standards on personal data protection, as stipulated in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data.*

Germany considers it important to improve criminal justice statistics, and considerable efforts are being made in this area. These also include obtaining reliable and meaningful data on criminal proceedings for violence against women and domestic violence.

The Federal Ministry of Justice is currently working on a draft for a Criminal Justice Statistics Act. This is intended to consolidate the statistics on individuals in the criminal justice system and to achieve significant improvements. Among other things, the statistical criteria are to be expanded and in future will also include information on

the gender of the victims and on the relationship between the perpetrator and the victim. In addition, the Act is intended to lay the foundation for studies into recidivism and statistical statements regarding the entire course of the proceedings.

a) Apart from the witnesses, all mentioned information under recommendation 12) a. is already content of the registration in the Police Crime Statistics (PCS).

Family court statistics are available in the form of a yearly publication that sets out, among other things, the number of violence protection orders issued. Additionally, data on the sex of the applicant and the perpetrator is collected by family courts. The Federal Ministry of Justice urges the federal states to collect additional data on the relationship between the parties involved. This is sufficient to comply with the obligations under Art. 11 a) IC.

c) Due to personal data protection, there is no possibility to link cases or victims, among others, in the PCS at the federal level.

d) Particularly, as far as family courts statistics are concerned, it is essential to balance the need for information with the available resources. We will examine this point carefully against this background.

g) With regards to politically motivated crimes, the German police at the federal and state level collect data about gender-based motivation as part of the hate crime statistics. Until 2021, the category was named gender/sexual identity (Geschlecht/Sexuelle Identität). The case numbers are published under the following link:

https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/nachrichte/n/2022/pmk2021-fallzahlen-hasskriminalitaet.pdf;jsessionid=7529C744692C7AF2F3D596A5E95B925C.2_cid364?__blob=publicationFile&v=2

The categories have been extended to improve the recording. Since the start of 2022, the category gender/sexual identity is no longer used. Instead, the police now use the categories of “against women”, “against men” and “gender-based diversity” to differentiate between the different phenomena. The case numbers for 2022 will be published in the spring of 2023.

2. Population-based surveys

13. GREVIO encourages the German authorities to regularly conduct population-based surveys addressing all forms of violence against women covered by the scope of the Istanbul Convention (paragraph 68).

The Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ), the Ministry of the Interior, Building and Community and the Federal Criminal Police Office are currently planning a representative Gender Comparative Survey on the affectedness by violence of women and men in Germany, in particular relationship violence, sexual violence and digital violence.

The aim of the Gender Comparative Survey is to examine the dark field in the area of violent incidents in a gender-differentiated manner.

In addition to mapping the severity of violent incidents, risk factors for intimate partner

violence are to be identified. Furthermore, information on reporting behaviour and its promoting and inhibiting determinants will be included. The scientific study is also intended to determine valid data in order to be able to develop and expand support and assistance services in a more targeted manner.

The BMFSFJ has appointed a scientific advisory board to prepare and accompany the study. The advisory board consists of ten experts.

With the support of the advisory board, the Federal Government will develop the study design and in particular, the questionnaire. Data collection is planned for 2023/2024; the project is expected to be completed in 2025.

For the study on the phenomenon of forced marriage, refer to I. B.

Also, Germany would like to point out that the last empirical study on the prevalence of FGM was published in 2020, not 2017 as stated in the report.

3. Research

14. GREVIO encourages the German authorities to conduct or commission more research on the forms of violence covered by the Istanbul Convention that have so far not been addressed through research, and to regularly update the results of any previous research, in close co-operation with community-based organisations and NGOs (paragraph 72).

Please see above.

III. Prevention

A. General obligations (Article 12)

15. GREVIO encourages the German authorities to ensure that preventive action incorporates, approaches for the prevention of violence against women and girls exposed to or at risk of intersectional discrimination, on the basis of their experience, such as women and girls with disabilities, homeless women and migrant women and girls. Programmes and activities for the empowerment of women and girls should form part of preventive measures, as should specific action tailored to men and boys (paragraph 79).

As part of the Federal funding programme, “Ending Violence against Women together” (see II. B.), BMFSFJ funds several projects that take intersectional discrimination into account. For example, “SAIDA International e. V.”, who work to protect female migrants and asylum seekers, who are affected or threatened by female genital mutilation, receive state funding (about 180 000 euros) for the implementation of a project that plans for the extension of access to support systems, by offering outreach and interdisciplinary counselling and access to sensitised language mediation at shared accommodation and initial registration facilities. Information and preventive action are additionally provided through outreach health workshops, sex education and the establishment of self-help groups at the institutions mentioned above, as well as through the deployment of interdisciplinary networks. All measures are aiming at the protection and empowerment of affected or threatened women and girls.

The project “Prevention and aid regarding female genital mutilation in Central Germany” is implemented within three federal states: Saxony, Saxony-Anhalt and Thuringia. It started mid-April 2021 as a model project and runs until the end of December 2022. Findings (e.g. results of final evaluation, deployed concepts) will be presented officially to the professional field and aim to inform the development of similar support systems nationwide.

Furthermore, the “Katholische Stiftungshochschule München” (Catholic Foundation University Munich) receives funding (around 100 000 euros) for conducting scientific accompanying research by analysing and promoting the deployment of specific questionnaires for risk assessment as part of custody and visitation rights proceedings in the event of domestic violence. Amongst other objectives, the activities aim at empowering victims through the direct inclusion of their experiences in statements of state officials and other professionals, hence, in the legal process. By doing so, the greater goal of implementing the principle of “safety first” within the legal field is to be pursued. The project started at the beginning of September as a model project in Munich, where the questionnaire was first developed and deployed. It runs until the end of December 2022. Findings with regards to the successful implementation of the questionnaire will be discussed at a conference where professionals from all over Bavaria take part and that is accessible online and nationwide. A report on the findings, including transdisciplinary recommendation for action, will be published by the end of the project.

Action tailored to men and boys includes preventive work focusing on qualification measures for professionals who work with violence-prone and violent men. The project “Basic knowledge on male violence” receives around 80 000 euros state funding and aims to enable professionals within the respective field of work (for example job centre) to recognise the dynamics of violence and to improve their knowledge as well as their abilities while engaging with these men. The Caritas association for the diocese Münster is implementing this project (1st of May 2021 until the end of November 2022) within the region of Münster as a model project aiming to qualify about 100 professionals through a five-day training course by the end of the project. Findings, as well as for example the developed concept, will be published and spread via the organisation’s networks (nationwide).

Other actions focus on further developing counselling concepts. A state-funded project that is implemented by the “Centre for the Prevention of Violence Berlin” aims to focus on the entire family, especially the violent men, within which domestic violence occurs in order to break the cycle and prevent violent behaviours and the underlying value systems to be passed on to later generations. The counselling concept includes separate counselling for each member of the family with the respective organisation (perpetrator counselling, women’s assistance centre, child therapists, youth welfare office). The project runs in Berlin (model location) for almost two years until the end of December 2022 and received around 700 000 euros in funding. Findings will be published by the end of 2022 to inform similar projects nationwide.

Apart from the Federal Funding Programme, it is important to note that the women support networking organisations funded by the BMFSFJ take non-discriminatory and barrier-free approaches into account in their measures and actions.

In addition to the initiative “Free from clichés”, which is mentioned in the report, there

are other important initiatives sponsored by the German government to break down gender stereotypes and clichés in the vocational context. For example, there is the Girls' Day and Boys' Day action day sponsored by the Federal Government. On this day of action, girls and boys can learn about professions in which their gender has been underrepresented to date. The German government has been sponsoring Girls' Day since 2001 and Boys' Day since 2011.

Equal work with boys and men also means recognising that boys and men can also be victims of violence. Protection from violence is a human right. Men often experience severe forms of physical violence, especially from younger men outside the home. Support services also for male victims of violence must therefore be implemented as part of an overall strategy/uniform national framework on gender-based and domestic violence. The Federal Office for the Protection of Men against Violence (BFKM) is, therefore, also funded by the Federal Government to actively advise and support municipalities, states, independent agencies and individual actors in the establishment of men's protection facilities.

The declaration mentioned in Para 75 "Together against sexism and sexual harassment!" with partners such as the BDA, German Association of Cities (Deutscher Städtetag), the DGB and companies such as Microsoft, VW, BASF and the Charité has been signed by more than 330 companies, associations and organisations. It is planned to expand this network in implementation of the coalition agreement into a strong alliance against sexism.

Regarding this recommendation, also refer to I. C. 3 for information about DaMigra.

B. Awareness raising (Article 13)

16. GREVIO strongly encourages the German authorities at all levels to promote or conduct, on a regular basis and as part of a wider preventive strategy encompassing primary, secondary and tertiary prevention activities, awareness-raising campaigns or programmes on the different manifestations of violence against women, including in co-operation with civil society actors such as national human rights institutions, equality bodies and non-governmental organisations working with and representing women and girls, including those at the intersection of discrimination (paragraph 82).

17. Furthermore, GREVIO encourages the German authorities to step up efforts to ensure greater co-ordination between federal, regional and local-level campaigns, to ensure synergies and to ensure that the efforts at the different levels contribute to the overall goals by setting clear objectives, targets and indicators to measure outcomes (paragraph 83).

See above I. C. 2 regarding the national coordinating body.

D. Training of professionals (Article 15)

19. GREVIO urges the German authorities to ensure that all professionals dealing with victims or perpetrators of all forms of violence covered by the scope of the Istanbul Convention receive systematic and mandatory initial and in-service training on identifying and responding to all forms of violence against women, while focusing on the victims' human rights, safety, individual needs and empowerment and the prevention of secondary victimisation. Such training should be based on the principles of non-discrimination and equality between women and men and devised in close co-

operation with regional and local authorities, as well as relevant stakeholders, including independent women's NGOs providing specialist support to women victims of violence. Clear protocols and guidelines should be established to set the standards that staff are expected to follow in their respective fields (paragraph 102).

20. GREVIO strongly encourages the German authorities to focus on the debunking of harmful gender stereotypes and rape myths in the training of law-enforcement officials and members of the judiciary (paragraph 103).

Adequate training of judges and prosecutors is considered to be very important, and ongoing efforts will be continued.

The German Länder already offer appropriate further training measures for judges and public prosecutors. The German Judicial Academy (Deutsche Richterakademie) also offers the opportunity to attend corresponding training events.

However, it has to be taken into account that mandatory on-the-job training for judges might interfere with judicial independence.

The Quality Management Guideline of the Joint Federal Committee on Health (G-BA) has already included binding requirements for the 'prevention of and assistance in cases of abuse and violence' (Part A section 4 paragraph 2 'Methods and instruments' last bullet point) with the aim of preventing, recognising, adequately responding to and preventing abuse and violence within the facilities, in particular, with regard to vulnerable patient groups. Depending on the size of the facility, the range of services and the patient clientele, information materials, contact addresses, training/education, codes of conduct, recommendations for action or comprehensive protection concepts can be used. Part B section 1 sentence 9 specifies requirements for protection concepts against (sexual) violence against children and adolescents. However, these requirements may be dispensed if staff and equipment or the local conditions of the facilities or other medical or technical features obviously prevent the use of these instruments.

The regulations at the federal level regarding the requirements for training in medical and other health professions provide the framework, which is specified by the Länder, schools, universities and training institutions through detailed definition of the training content in the curricula. Universities can use the National Competence-Based Learning Objectives Catalogue for Medicine (Nationaler Kompetenzbasierter Lernzielkatalog Medizin - NKLM) as a guide when designing curricula for medical training. This is a non-binding model curriculum that defines the competencies that students should have upon completion of their medical training. This curriculum includes, for example, the teaching of competencies for the topic of sexualised and domestic violence.

In the training for federally regulated nursing professions and midwives, which were reformed in the past years, the topics of prevention and detection of violence against women, intervention standards, equality, victims' needs and rights, ways to prevent secondary victimisation and also inter-agency cooperation are integrated to the extent required for the training. The Federal Ministry of Health (BMG) will continue to consider these issues in future reforms.

The project "Protection and help in cases of domestic violence - an interdisciplinary online course" focuses on educational work with concrete target groups. Its aim is to develop a web-based interdisciplinary training programme on the topic of violence in couple relationships. The target group includes professionals from child and youth

welfare services as well as from the police and the judicial and medical systems
<https://haeuslichegewalt.elearning-gewaltschutz.de/>

The project concluded end of April 2022 with a nation-wide conference in Berlin, where the course was presented publicly by the project team. The Länder have committed to provide resources for a continuation of the online training programme for the next five years.

E. Preventive intervention and treatment programmes (Article 16)

1. Programmes for perpetrators of domestic violence

21. GREVIO strongly encourages the German authorities to step up efforts to ensure, through sustainable public funding and on the basis of the standards approved by the Federal Ministry for Family Affairs, Senior Citizens, Family and Youth, the setting up of dedicated domestic violence perpetrator programmes throughout the country. Furthermore, GREVIO encourages the German authorities to (paragraph 111):

- a. *ensure that the perpetrator work institutions are embedded in the local intervention structures and closely co-operate with all stakeholders, such as women's support organisations, the police, the justice system and other support services like the youth welfare office;*
- b. *introduce perpetrator programmes in custodial settings, where they do not yet exist;*
- c. *raise awareness and disseminate knowledge on perpetrator work among the relevant prosecution authorities and judges who are legally competent to order offenders to attend preventive intervention and treatment programmes;*
- d. *ensure that the impact of all programmes is monitored by independent entities, in line with standard methodological rules, and that independent scientific outcome studies of the treatment methods are carried out.*

The Federal Government strives to strengthen and further expand work with perpetrators of domestic violence, especially in the context of inter-institutional cooperation alliances. Within the framework of its limited funding competence, the Federal Government supports model projects and structurally, the umbrella organisation Bundesarbeitsgemeinschaft Täterarbeit häusliche Gewalt (Federal Working Group on Work with Perpetrators of Domestic Violence (BAG TäHG)). However, the BAG TäHG standard has not been audited or certified by BMFSFJ (see also No. 105 GREVIO Report). We have only published it. There are federal states that make the funding of offender work dependent on the fact that the funded facilities work according to the standard.

2. Programmes for sex offenders

22. GREVIO encourages the German authorities to ensure nationwide coverage of specialist programmes for sexual offenders, both inside prison settings and as outpatient programmes (paragraph 115).

Working with sex offenders to prevent future sexual assaults is an important ongoing task. The Länder, which are responsible for this, are already making considerable efforts and providing a variety of programmes.

F. Participation of the private sector and the media (Article 17)

23. GREVIO encourages the German authorities to actively support and promote the involvement of the private sector, including the information technology sector, in the prevention of violence against women in all its forms, including by providing guiding principles for private-sector companies in establishing internal procedures to address sexual harassment. It further encourages the authorities to collect data to assess the implementation of Germany's General Equal Treatment Act with respect to measures aimed at preventing sexual harassment in the workplace, as well as to review and follow up the outcomes of measures undertaken by the Federal Anti-Discrimination Agency in such cases (paragraph 124).

24. With a view to the important role of the media in promoting equality between women and men and reducing the level of acceptance of violence against women, GREVIO encourages the German authorities to tap into the potential offered by the high level of awareness of the issue among the various media and press councils and set incentives or otherwise promote the development of specific self-regulatory standards in relation to the non-sensationalist and balanced reporting on violence against women (paragraph 125).

Germany fully supports the objective of non-sensationalist and balanced reporting on violence against women, which is also reflected in the national media regulation. However, as also stated in Article 17 (1) of the Convention, state authorities must respect the independence of the media. The national regulation implies that the constitutional order must be respected and balanced reporting must take place (e.g. §§ 26, 51 State Media Treaty). Furthermore, it should be noted that the Press Code of the German Press Council or the guidelines of the media providers themselves already contain detailed regulations regarding the reporting of acts of violence.

The publication "Together against Sexism", which is the result of the "Dialogue Forums against Sexism" (see above para 75 and: <https://www.dialogforen-gegen-sexismus.de/handreichung-1>), addresses the private sectors and the workplace as well as the media with concrete measures that help to prevent and fight sexism.

BMFSFJ also funded the following projects: In its podcast, the association "ProQuote Medien" deals with the topic "Away with sexism in the media!" The podcast is available on the website of "ProQuote Medien" (<https://www.pro-quote.de/machts-gleich-proquote-medien-startet-podcast-zum-thema-sexismus-2/>).

The association Drago - Power to Transform! has published a sexism lexicon. Among other things, it deals with the questions: Where and how is sexism reproduced in the media? And why do we encounter recurring patterns and stereotypes in the media? It can be found online: <https://sexismus-lexikon.de/>.

IV. Protection and support

A. General obligations (Article 18)

25. GREVIO urges the German authorities to significantly increase efforts at all relevant levels in order to embed the provision of services for victims of all forms of violence covered by the Istanbul Convention in multi-agency co-operation structures that involve all relevant actors, including women's specialist support services, and that operate in accordance with protocols and guidelines for co-operation, based on a gendered understanding of violence against women and domestic violence and focusing on the human rights and safety of victims, as well as on their empowerment and economic independence. To this end, GREVIO urges the German authorities to establish mandatory guidelines and/or protocols for relevant professionals on how to respond to cases of

violence against women as covered by the Istanbul Convention on the bases of multi-agency co-operation (paragraph 135).

26. GREVIO strongly encourages the German authorities to ensure that protection and support services are made available as much as possible on the same premises ("one-stop shop") (paragraph 136).

Under the law on the division of competences, the federal states are largely responsible for the provision of protection and support services, including "one-stop shops" and their coordination. However, with the entry into force of § 37a of the Social Code IX service providers are obligated to ensure appropriate protection measures against violence, such as the implementation of institution-tailored comprehensive strategies. These should include guidelines and/or protocols for relevant professionals on how to respond to cases of violence against women. The Federal Ministry of Labour and Social Affairs supports relevant service agencies in defining criteria for the implementation of § 37a SGB IX.

The statutory instrument of women's representatives in all sheltered workshops for disabled persons, which was implemented in 2017, has proven to be a successful measure to empower women with learning disabilities and to increase protection against violence in such institutions. The three-year project "Make the Federal Network for Women's Representatives in Institutions Strong", which started in October 2019, aims to test structures and democratic opinion-forming processes. In January 2023, the national network will be installed as an independent, self-determined and permanent national representation of women's interests in workshops.

Another element of increasing efforts to embed the provision of services for victims of all forms of violence is the national interministerial strategy (see I. C. 2.).

B. Information (Article 19)

27. GREVIO encourages the German authorities to continue their efforts to proactively and systematically provide easily accessible information in all relevant languages, including easy-to-understand language and in formats that are accessible to persons with disabilities, to women victims of all forms of violence, and to include information about rights and services for victims in information packages for migrant and asylum-seeking women (paragraph 142).

Germany recognises the importance of providing relevant, easily accessible and easy-to-understand information to victims of violence. To this end, since 2020, Germany has provided the internet support platform 'Hilfe-Info.de' for people who have been victims of a crime. The content on the platform is available in simple language and is easily accessible, for example, through video and audio interviews. The support platform is available in German and English.

On the support platform, victims can easily find help, advice and information on financial, psychological and forensic support as well as on the course of criminal proceedings. The information is presented for different groups of victims (for example, victims of terrorist or extremist attacks, women, children and adolescents)

and/or in an offence-specific manner. For instance, local victim support and counselling services can be found for different types of criminal offences such as sexual, physical or psychological violence. Furthermore, an anonymous helpline for women who have experienced (sexual) violence is also provided free of charge. Guidelines on how to secure evidence in cases of sexualised or physical (domestic) violence as well as an overview of facilities for the anonymous securing of evidence are also presented. Last but not least, the platform offers information on the rights victims have in court and on the kind of support they are entitled to. This information is also summarised in the “Leaflet for Victims of Crime” which has been translated into 29 languages and is also available in simple language.

Reference is also made to www.odabs.org, which brings together a lot of information for victims of violence and is available in 7 languages.

The women’s support services networking centres funded by the BMFSFJ provide a wide range of information in simple language and in different foreign languages.

The National Violence against Women Helpline is an accessible service, that expressly also targets women and girls with disabilities or impairments. The counsellors are specially trained to advise women with disabilities. Counselling sessions can be held in an easy-to-understand language or with the support of sign language interpreting if required. Moreover, the helpline is available in 19 languages.

DaMigra also has access to migrant and refugee women and provides to them relevant information for migrant and asylum-seeking women. See above Introduction I C 3 concerning DaMigra.

The German government has published a protection letter against female genital mutilation (FGM) containing information on FGM e.g. its health risk but also its criminal liability in Germany and abroad. It also contains different contacts in case of support needed. It has been translated in 16 languages.

C. General support services (Article 20)

2. Healthcare services

29. GREVIO strongly encourages the German authorities to implement standardised care paths that include the identification of victims, screening, diagnosis, treatment, documentation of injuries and referral to the appropriate specialist support services, and to promote and institutionalise multi-agency co-operation between the healthcare sector and specialist services. Moreover, barriers to accessing the healthcare system for women with disabilities and women asylum seekers should be removed (paragraph 151).

Asylum seekers are generally entitled to benefits under the Asylum Seekers Benefits Act (AsylbLG). The federal states are responsible for implementing the AsylbLG and thus, also for ensuring the access to health care according to the AsylbLG. After 18 months of residence in Germany, persons entitled to benefits under the AsylbLG are treated the same as persons with statutory health insurance.

D. Assistance in individual/collective complaints (Article 21)

30. GREVIO invites the German authorities to step up their efforts to ensure victims have information on and access to applicable regional and international complaint mechanisms (paragraph 155).

Germany would like to point out that a wide range of information is already made available to victims. For example, various information brochures can be downloaded from the website of the Federal Ministry of Justice. In addition, information on help portals can also be found.

https://www.bmj.de/DE/Themen/OpferschutzUndGewaltpraevention/OpferhilfeUndGewaltpraevention_node.html

Furthermore, the necessary information is often available in the form of brochures from the relevant authorities and courts.

The BMFSFJ-funded networking agency "Bundesverband der Frauenberatungsstellen und Frauennotrufe (bff)" (The Federal Association of Rape Crisis Centres and Women's Counselling Centres in Germany) has a mediation board that can be involved by clients or professionals of the bff member organisations.²

In addition, since 2019 the BMFSFJ has been funding the project "Complaint management for quality development in women's shelters: Instrument for Professionalisation and Participation" of the Network Office for the Coordination of Women's Shelters.³ The aim of the project is to further develop the quality of support services and professionalism in women's shelter work by including the perspective of residents. This is to be done through a concept for complaint management, i.e. on the one hand through the further development of already existing internal forms of participation in women's shelters and through the development of a procedure for external complaints.

E. Specialist support services (Article 22)

31. GREVIO is concerned by the disparity in terms of levels of service provision for the different forms of violence covered by the Istanbul Convention, which vary significantly between the 16 federal states, as well as within each federal state. Aside from creating a form of hierarchy among victims, it leaves a significant number without specialist support. GREVIO urges the German authorities to ensure that the provision of specialist support services meets the demands of victims, irrespective of the form of violence they have experienced, and that these specialist services operate in accordance with minimum standards. In particular, GREVIO urges the German authorities to (paragraph 168):

- a. ensure that women and girl asylum seekers who live in reception centres have access to adequate support services;
- b. increase internal and external support provision and services for women with disabilities living in institutions;
- c. improve the availability of specialist services for girls and young women;
- d. step up their efforts to assess the needs for specialist services for Roma and Sinti women victims of violence;

² <https://www.frauen-gegen-gewalt.de/de/schlichtungsstelle-des-bff.html>

³ <https://www.frauenhauskoordination.de/arbeitsfelder/partizipation>

- e. *assess the need for further support services for victims of forced marriage;*
- f. *ensure that specialist services also cater to LGBTI women;*
- g. *assess the provision of specialist services for other forms of violence and groups of victims and make adjustments as required;*
- h. *assess whether proactive counselling of hard-to-reach victims can be extended.*

32. GREVIO invites the German authorities to take stock of the good practices that have emerged from the federal states and consider whether they could be rolled out more broadly, by providing, among other things, a secure financial basis for them (paragraph 169).

Recommendation 31:

Please refer to I. C. 2., II C. 9. and IV. F. 33.

In addition, one of the tasks of the networking centres funded by the BMFSFJ is to collect, bundle and disseminate relevant information and developments (e.g. current research results, best practice examples).

a) In order to ensure that women and girl asylum seekers who live in reception centres have access to adequate support services, initiatives are carried out offering consultation hours, informative workshops and self-help groups at shared accommodation and initial registration facilities. Please refer to SAIDA International e.V. project under III. A.

c) German authorities recognise the need to improve the availability of specialist services for girls and young women. The government funding programme “Ending Violence against Women together” provides funding (total of 15 million euros) over the duration of three years to projects all over Germany due to their highly innovative nature regarding tackling minority issues and areas within the support system that have not yet been addressed. Projects like “Aid for women with complex experiences of violence” (Wildwasser Würzburg e. V.) cater to the needs of victims with dissociative personality disorder, for example. Due to the severity of the violence experienced and the complex resulting pathology, there is a demand for specialist services that is to be met. The model project runs for more than one and a half years until the end of December 2022, receives around 140 000 euros in state funding and is located in Würzburg. Counselling for victims, cooperation with psychosocial institutions and training institutes, trainings, informative talks on the matter as well as lobbying aim at raising awareness for the special needs of the victims and strengthening the respective support system.

The independent commissioner for child sexual abuse issues provides a Child Sexual Abuse Help Portal. The Help Portal offers a nationwide database listing counselling centres, emergency services as well as therapeutic, medical and legal help services. It is possible to search for help services that specifically address girls and young women.

The independent commissioner also provides financial support for a nationwide helpline and online advice service on sexual abuse targeting specifically young people.

Recommendation 32:

German authorities take stock of the good practices that have emerged from the federal states. For example, during the implementation of the project by zoom e. V.,

local structures and specific procedures to systematically consider domestic violence throughout custody and visitation rights proceedings in the event of domestic violence are analysed nationwide. Good practices are identified throughout the 14-month model project (around 130 000 euros state funding), while then looking closer at six specific and diverse locations and their practices in Germany.

F. Shelters (Article 23)

33. GREVIO urges the German authorities to increase the number of available shelter places, with an adequate geographical distribution throughout the country, and to ensure that all women victims of violence, regardless of their status under the Social Code or other factors – in particular girls under 18 years of age, LGBTI women, women with sons above a certain age, women with many children, women with disabilities, women fleeing so-called “honour”-related violence, asylum-seeking women and those with an insecure residence status – have free-of-charge access to dedicated domestic violence shelters. In that context, GREVIO urges the German authorities to take account of the principle that only accommodation in dedicated, single-sex and specialist structures can meet the requirements of the Istanbul Convention, and that shelters for the homeless cannot serve as a replacement (paragraph 177).

Following the coalition agreement and taking into account the federal division of tasks, the Federal Government is examining how the assistance system can be expanded in line with demand (please see II B for further details).. The before-said also applies to needs-based support and shelters for male victims of intimate partner violence. When setting up the planned federal legal framework, the needs of vulnerable groups such as women with disabilities, refugee women and queer people will be taken into account.

With the Federal Funding Programme "Ending Violence against Women together", the Federal Government seeks to help, within its funding competences, to fill the gaps known to exist in the assistance system. This includes innovative ways to improve both access to the support system and services for target groups that have been insufficiently reached so far. The aim is to contribute to the needs-based expansion of services provided by women's shelters and the relevant drop-in counselling centres. In the investment-related part, the Federal Government will make 30 million euros a year, available up to 2024.

H. Support for victims of sexual violence (Article 25)

34. GREVIO urges the German authorities to take legislative and other measures to comply with the requirements of Article 25 of the Istanbul Convention. To this end, the authorities should establish a sufficient number of emergency centres, in an adequate geographical distribution, that form part of a multi-agency approach to service provision, accessible to victims of rape and/or sexual violence, which meet all their needs in the short, medium and long term and which provide immediate medical care, high-quality forensic examinations, psychological and legal support, and referral to specialist organisations, on the basis of protocols for relevant professionals that should be developed and made applicable nationwide, in order to comprehensively address this form of violence. A victim's access to such support services should not depend on her insurance status or other factors, such as her willingness to report the violence to the authorities. Moreover, awareness should be raised among healthcare personnel that minors who are capable of consenting to treatment may do so without the approval of their legal guardians (paragraph 191).

The independent commissioner for child sexual abuse issues advocates for multidisciplinary and interagency cooperation when responding to child violence. One of the priorities of the National Council on Combating Sexual Violence against Children and Young People is, therefore, to improve interdisciplinary cooperation by networking all professions, institutions and organisations, whose work touch the field of sexual abuse.

The independent commissioner also supports the establishment of childhood houses in Germany and encourages a nationwide scientific monitoring and evaluation process of the childhood houses.

Corresponding guidelines are available nationwide. Implementation is in the responsibility of the facilities and practitioners in accordance with the Quality Management Guideline of the Joint Federal Committee on Health (G-BA).

With the social compensation law, all victims of violent crimes have a legal right to services from the trauma outpatient clinic since January 1, 2021. Access is regulated at a very low threshold. Victims of violent crimes receive all available assistance in a trauma outpatient clinic as quickly and straightforwardly as possible.

In addition, outpatient clinics for protection against violence have already been established in large centres. For example, the outpatient clinic for protection against violence at the Charité – Universitätsmedizin Berlin: The outpatient clinic for protection against violence at the Charité Universitätsmedizin Berlin is a low-threshold offer for victims of violence to have the injuries they have suffered to be forensically examined and documented. This is also possible without involving the police and free of charge. If necessary, further counselling and referral to other facilities can be provided. The counselling can be accompanied by interpreters or language services.

V. Substantive law

A. Civil law

1. Civil remedies against the state – ensuring due diligence (Article 29)

36. GREVIO encourages the German authorities to examine any barriers to the use of civil law measures available to hold the state accountable for public officials' failure to comply with the obligation to diligently prevent, investigate and punish acts of violence covered by the Istanbul Convention, including in the context of wrongful decisions in the administration of justice, in order to enable women victims of violence to make practical use of the existing legal remedies. Progress in this area needs to be measured by collecting data on the number of proceedings initiated by victims and their outcomes (paragraph 208).

Germany considers its law on state liability to be adequate. For example, it already provides for effective liability of the state in cases of culpable breaches of duty by public officials. We, therefore, currently see no barriers in civil law to holding the state accountable for the behaviour of its public officials.

Considering effective compensation in case of wrongful decisions in the administration of justice, we believe that the current German law finds a workable balance between the constitutional principle of judicial independence and legal certainty on the one hand and

effective compensation for wrongful decisions on the other hand. The question of whether a judge made an erroneous ruling is generally open to review by a higher court. Further reviewability in the context of a liability suit could undermine the legal force of a decision not challenged by an appeal.

2. Compensation (Article 30)

37. GREVIO strongly encourages the German authorities to (paragraph 217):

- a. *take the necessary measures in order to ensure that wider use is made of the legal possibilities to claim compensation for women victims of any of the forms of violence covered by the Istanbul Convention, in particular by examining and addressing the reasons for the low number of applications for compensation under the Act on Compensation for Victims of Violent Crimes, and the relatively low number of granted claims. In this context, GREVIO strongly encourages the German authorities to take measures to put an end to the practice of qualifying women who remain in abusive relationships as ineligible for compensation well before the entry into force of Book No. XIV of the Social Code;*
- b. *collect data, disaggregated by sex, age, type of violence, the relationship of the perpetrator to the victim and geographical location, of compensation claims made and granted under the OEG as well as compensation granted in the context of criminal proceedings;*
- c. *ensure that claims under the Act on Compensation for Victims of Violent Crimes are dealt with within a reasonable time as required by Article 30, paragraph 3, of the Istanbul Convention, to ensure that victims receive the financial and material support they urgently need.*

a):

Germany fully complies with the requirements for state compensation contained in Article 30 (2) or even exceeds the required level:

All recognised victims of violent crimes are entitled to curative treatment and - if the corresponding needs exist - to welfare benefits, such as subsistence assistance. Thus, Germany has initially chosen a compensation equivalent in the sense of Art. 30 (2): the state-funded health and social provisions.

Against this background, the figure of 2.43% in compensation granted quoted in this context in the report cannot be understood.

Germany not only fulfils the minimum requirements of Article 30 (2), it even goes beyond this by also providing for (permanent, monthly) compensation payments in certain cases according to the OEG.

These additional compensation payments are linked to further preconditions, such as a permanent health damage of at least 6 months and proof of causality between these health damages and the act of violent crime.

Thus, the reasons why so few applications for compensation - in relation to the total number of victims of violent crimes - are submitted or why only a small proportion of applications receive a positive decision are known:

The victims do not fulfil the stated requirements for compensation and therefore do not file an application or the applications filed are rejected.

Most victims of violence do not fulfil the requirement of permanent damage to health or the causality cannot be proven.

In the text, representations are quoted (in particular by the Weisser Ring, see also paragraph no. 141 and footnote 119), which relate figures to each other in such a way that the result does not contain any reliable statement:

Thus, the applications for compensation according to the OEG were compared with the number of total victims of violent crime. Against the background that applications for compensation are only promising in the case of permanent health damage, no reliable statement can be deduced from this correlation.

There is no practice of qualifying women, who remain in abusive relationships, as ineligible for compensation. This is - according to German jurisprudence - only the case if leaving the abusive partner is reasonable.

b):

§ 127 of SGB XIV provides for the collection of most of this data, so that it will be collected from 1st January 2024.

c):

As explained above, Germany has chosen the state-funded health and social provisions made possible in Art. 30 (2) as “basic compensation”. Art. 30 (3) is applicable only to these benefits. These benefits are usually provided within a reasonable time (sometimes even before the application is filed). The victims of violent crimes, thus, receive the support they urgently need.

Victims can also get access to emergency aid in trauma outpatient clinics (so-called trauma ambulances). Since 1.1.2021, for the first time, victims have a legal claim to benefit from a trauma ambulance. These trauma ambulances are usually located at psychiatric and / or psychotherapeutic clinics.

As far as other benefits are concerned, there is the possibility of getting provisional benefits before the final decision is taken.

3. Custody, visitation rights and safety (Article 31)

38. GREVIO urges the German authorities to take all appropriate measures, including legislative measures where necessary and providing specialised training and appropriate guidelines, to ensure that all relevant professionals, including social workers, youth welfare officers, members of the judiciary, court experts and child psychologists, when deciding on custody and visitation (paragraph 228):

- a. *are duly aware of and take into account the negative impact on children of violence by one parent against the other;*
- b. *are aware of the lack of a scientific basis for so-called “parental alienation” and similar concepts;*
- c. *incorporate a process for screening cases for a history of violence by one parent against the other and for identifying whether it has been reported, including for cases referred to out-of-court settlement.*

39. GREVIO further urges the German authorities to (paragraph 229):

- a. *improve the co-operation between family courts and specialist services that assist victims and their children in proceedings concerning custody and visitation rights;*

- b. *take steps to ensure that procedures and decisions in such cases do not endanger the safety of women victims of intimate partner violence, in particular by not disclosing their place of residence.*

40. GREVIO strongly encourages the German authorities to evaluate the effects of the current judicial practice of deciding on custody and visitation rights on the safety of women victims of domestic violence and their children, including linkages to gender-related killings of women and their children, to analyse relevant case law and to collect data on the use that is made by judges of limiting or withdrawing parental or visitation rights in the context of domestic violence, with a view to reconsidering the criteria for supervised visitation (paragraph 230).

Recommendation 38:

Since 1st January, 2022, specific qualification requirements for family judges and guardians ad litem apply. These also include knowledge of the child's developmental psychology, covering knowledge of the aspects mentioned under a) and b). The best interests of the child are the key factors in deciding child matters, including contact and parental authority. Legitimate interests of other participants have to be taken into account. In contact and custody proceedings, the files of previous proceedings are consulted and the youth welfare office is also heard. Known histories of violence by one parent against the other can thus be determined and taken into account in the decision. Furthermore, the coalition forming the German government agreed to ensure that domestic violence must be taken into account in contact proceedings.

Recommendation 39:

If it is necessary for their safety or for other reasons, women victims of intimate partner violence are heard in the absence of the former partner. Insofar as this is evident or desired, the place of residence of these women is kept secret and can also be kept secret from the court, for example by means of an authorised representative.

Recommendation 40:

It is part of the authorities' tasks to monitor case law and legal practice, inter alia, to determine whether legislative changes should be made. As the current legal framework provides an adequate level of protection and further improvements are to be made, an assessment and data collection as comprehensive as the one in the call is currently not planned.

4. Civil consequences of forced marriages (Article 32)

41. GREVIO encourages the German authorities to harmonise the procedures for the dissolution of forced marriages throughout the country, making the procedure easily accessible and ensuring that it does not entail an undue financial or administrative burden for the victim, as required under Article 32 of the Istanbul Convention (paragraph 235).

The judicial procedure is harmonised, with administrative requirements limited to what is necessary. If the legal requirements are met, legal aid is granted, which includes the costs of a lawyer.

B. Criminal law

1. Psychological violence (Article 33)

42. GREVIO strongly encourages the German authorities to investigate, prosecute and punish effectively acts of psychological violence online and offline by making full use of the available provisions in the German Criminal Code. To effectively criminalise all acts that seriously impair the psychological integrity of a person as required by Article 33 of the Istanbul Convention, GREVIO strongly encourages the German authorities to consider creating a separate offence which takes into account all elements of the crime as required by the convention (paragraph 243).

Article 33 urges the parties to take the necessary legislative or other measures to ensure that the intentional conduct of seriously impairing a person's psychological integrity through coercion or threats is criminalised. Conduct that affects a person's mental well-being in such a way that the impairment is physically objectifiable (e.g. in the case of depression) is already punishable under the current law. Thus, the provocation or aggravation of such a psychological pathological impairment can constitute an injury to health, which can be punished as bodily harm under Section 223 of the Criminal Code (Strafgesetzbuch, StGB), with a penalty of imprisonment for up to five years or a fine. No distinction is made between offences committed online and those committed offline. In addition, the offence may constitute coercion (Section 240 StGB) or a threat (Section 241 StGB). Punishable conduct within the meaning of Article 33 IC can therefore be sufficiently covered.

3. Physical violence (Article 35)

43. In the absence of a reservation regarding the right not to ensure criminal investigations into and prosecution of offences established in accordance with Article 35, GREVIO strongly encourages the German authorities to take legislative and/or other appropriate measures to ensure wider levels of prosecution of cases of physical violence in the context of intimate partner violence, including by establishing strict guidelines for prosecution, in order to enable victims to obtain justice and to contribute to the effective deterrence of this form of violence (paragraph 249).

Germany recognises the importance of an efficient and victim-oriented prosecution of cases of physical violence in the context of intimate partner violence. For that reason, the German Guidelines for criminal proceedings and fine proceedings (RiStBV) contain additional specific guidelines for such cases in numbers 220 and 222a, also ensuring a more sensitive treatment of victims of intimate partner violence (especially sexual violence) and therefore, contributing to the aim of enabling victims to obtain justice:

220 Consideration for injured persons

(1) The ordering and performance of physical examination requires caution, empathy and sufficient care and information. The performance of the physical examination should, if possible, be assigned to a person of the same sex or a medical force (Section 81d of the Code of Criminal Procedure) with due regard for the victim's sense of shame. If there is a justified interest, the wish to assign the examination to a person or a physician of a certain sex should be complied with. At the request of the person concerned, a person of trust shall be admitted. The person concerned shall be informed of the two aforementioned regulations.

(2) Photographs of injured persons showing them wholly or partially undressed shall be placed in a sealed envelope or separately stapled for the files and when inspection of the files is granted, - unless it is for the injured person himself -

temporarily removed from the files. In this respect, the defence shall be granted access to the files at the office (Section 147 (4) sentence 1 of the Code of Criminal Procedure).

222a Hearing of the person injured by an offence under sections 174 to 182 of the Criminal Code (i.e. offences against sexual self-determination)

(1) Prior to the initiation of measures terminating proceedings under sections 153(1), 153a(1), 153b(1) or 154(1) of the Code of Criminal Procedure, the injured party shall be given the opportunity to comment on the intended termination of proceedings, but in cases under section 154(1) of the Code of Criminal Procedure, only if the termination is to take place with regard to other offences to the detriment of third parties. This may be dispensed with if the injured party has already been questioned on this during his examination as a witness. If the injured party objects to an intended measure and the proceedings are discontinued, an appraisal of his objections shall be included in the notice of discontinuance (Nos. 89, 101 para. 2).

(2) The injured party shall also be given the opportunity to be represented by legal counsel in any discussion of the status of the proceedings pursuant to Section 160b of the Code of Criminal Procedure and with regard to any decision on indictment pursuant to Section 24, Subsection 1, No. 3 of the Code of Criminal Procedure or Section 26, Subsection 2 of the Code of Criminal Procedure (cf. No. 113, Subsection 2) with regard to his or her particular need for protection. In appropriate cases, the injured person himself/herself may also be involved in the discussion of the status of the proceedings.

Furthermore, according to Section 48a (1) StPO, the particular vulnerability of victims of crime must be examined at the beginning and in all phases of the criminal proceedings. All authorities and courts involved in criminal investigations are obligated to assess the vulnerability of the injured person from the first point of contact with the prosecuting authorities individually. The scope of the assessment and the resulting protection measures are always based on the needs of the individual victim in a specific case.

4. Sexual violence, including rape (Article 36)

44. GREVIO encourages the German authorities to monitor and further evaluate the implementation of the new sexual offences legislation, in particular Article 177 of the German Criminal Code, with a view to further aligning its definition of consent with that set out in Article 36, paragraph 2, of the Istanbul Convention (paragraph 253).

With the amendments made by the 50th Criminal Law Amendment Act in 2016 and the introduction of the “no-means-no principle” in section 177(1) of the Criminal Code, Germany has undergone a paradigm shift in its criminal law on sexual offences. The will of the victim has been placed at the centre of the protection afforded under criminal law.

Germany will carefully monitor the effects of the new provisions and the application of the offence elements.

6. Female genital mutilation (Article 38)

45. GREVIO encourages the German authorities to criminalise the intentional conduct of coercing or procuring a woman to undergo female genital mutilation and the intentional conduct of inciting, coercing or procuring a girl to undergo the act as set out in Article 38b and c of the Istanbul Convention (paragraph 259).

The conduct in question can already be punished under criminal law: Section 240 (1) of the German Criminal Code (Strafgesetzbuch, StGB) provides that whoever unlawfully, by force or threat of serious harm, compels a person to do, acquiesce to or refrain from an act incurs a penalty of imprisonment for a term not exceeding three years or a fine. Thus, anyone who threatens a woman or a girl with serious harm in the event that she resists being taken to undergo genital mutilation or resists the act itself is criminally liable. Depending on the circumstances of the individual case, complicity in a criminal offence under Section 226a StGB (female genital mutilation) may also apply. If the person concerned is held in a place against her will for the purpose of genital mutilation, deprivation of liberty (Section 239 StGB) may also come into consideration.

7. Forced abortion and forced sterilisation (Article 39)

46. GREVIO strongly encourages the German authorities to ensure that in any procedures authorising the sterilisation of legally incapacitated women, less invasive birth control options are considered with due regard to the best interest and self-determination of the women concerned (paragraph 267).

47. GREVIO encourages the German authorities to ensure that women with disabilities who undergo consensual sterilisation can make their decision on the basis of sufficient information designed in a disability-accessible manner, which is presented to them by professionals who are trained on gender and disability issues. Furthermore, GREVIO encourages the German authorities to collect data on the number of forced abortions and forced sterilisations, in order to gain knowledge of their extent, and take any necessary action (paragraph 268).

Recommendation 46:

In the current legal regime (Section 1905 (1) of the Civil Code) as well as in the future from 1st January 2023 (Section 1830 (1), no. 5 of the amended Civil Code), sterilisation of legally incapacitated women will, amongst other conditions, only be permissible and thus, only approvable if the pregnancy cannot be prevented by other reasonable means. Less invasive birth control options are prioritised; sterilisation is considered to be a last resort. In particular, sex education has to be considered alongside to chemical and mechanical methods to ensure that the women concerned retain their right to self-determination.

Recommendation 47:

In order to anchor the right to self-determination even more firmly, the Act on the Reform of Guardianship Law, which will enter into force on 1st January 2023, emphasises the principle of supported decision-making (“unterstützte Entscheidungsfindung”) instead of substituted decision-making. Professional court-appointed legal representatives will have to be trained in relevant communication skills that include accessible, addressee-oriented language to ensure that every woman concerned is empowered to make her own informed decision.

The Federal Ministry of Justice will evaluate the situation on sterilisation in guardianship law in the context of a research project in the near future to collect significant data to assess the need for further legislative action.

8. Sexual harassment (Article 40)

48. GREVIO strongly encourages the German authorities to ensure that the relevant provisions of the Criminal Code include verbal and non-verbal sexual harassment, and in particular are able to capture a pattern of sexual harassment whose individual elements, if taken on their own, would not necessarily result in a sanction (paragraph 273).

49. GREVIO encourages the German authorities to remain vigilant of current forms of digital violence against women and girls and to take the necessary legislative and practical steps to efficiently counter existing as well as newly emerging forms of sexual harassment perpetrated via ICT (paragraph 274).

Recommendation 48:

Germany shares GREVIO's desire to combat verbal and non-verbal sexual harassment. In this respect, German criminal law provides for criminal offences that grant comprehensive protection. For example, Section 184i of the Criminal Code (StGB) explicitly makes sexual harassment a punishable offence. In addition, the criminal offence of "insult" (Section 185 StGB) may also be relevant. This provides for a higher penalty for statements made in public, for example on the internet. The criminal offence of stalking (Section 238 StGB) covers certain forms of behaviour, both offline and online, which are suitable to seriously restrict a person's lifestyle. In certain cases, coercion (Section 240 StGB) may also come into consideration.

Recommendation 49:

The Federal Government is monitoring the current developments regarding offences in the digital space and will consider adjustments where necessary.

9. Aggravating circumstances (Article 46)

50. GREVIO strongly encourages the German authorities to (paragraph 282):

- a. *take appropriate measures to ensure that all aggravating circumstances listed in Article 46 of the Istanbul Convention are, in practice, effectively applied by the judiciary;*
- b. *ensure that awareness of the dynamics of intimate partner violence and killings is raised among the judiciary through training and a deepened understanding of the causes and consequences of intimate partner violence.*

Reference is made to the comment on no. 19.

10. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)

51. GREVIO urges the German authorities to take the necessary legislative and other measures, such as training and awareness raising among the judiciary and all others involved in reaching decisions on child custody, to ensure that prohibition of mandatory dispute resolution and mediation in criminal and civil law is applied in practice for cases concerning any of the forms of violence covered by the Istanbul Convention. GREVIO urges the German authorities to further strengthen the level of awareness among all professionals involved in court proceedings of the power imbalances in

relationships marred by violence, so they can take this into account when assessing whether to propose alternative dispute resolution measures. Attempts at settlements or mediation may never jeopardise the safety of a victim of violence or her children (paragraph 288).

Under the German criminal law, including criminal procedural law, no mandatory dispute resolution or mandatory mediation is established. This is true for all criminal cases, not only for cases covered by the Istanbul Convention. As stated in paragraph 283 of the Evaluation Report for Germany, the criminal court and the public prosecutor must always examine whether victim-offender mediation may be a feasible (or more correct, appropriate) instrument with regard to the specific circumstances of the individual case and this may not be imposed against the express will of the victim. Attempts at conciliation are not required in the case of any of the forms of violence within the scope of the Istanbul Convention. Especially in grave cases, the question of appropriateness of victim-offender mediation requires a very thorough assessment. If there was any risk to the safety of the victim or her children, the appropriateness would have to be denied.

There is no mandatory dispute resolution in decisions on custody. There is also no evidence that this legal situation is not sufficiently respected. The legal requirement that the family court should work towards an amicable agreement between the parties involved does not apply in matters relating to protection against violence. In contact and custody proceedings, this requirement only applies if this is not contrary to the best interests of the child, which is also the case if this would jeopardise the safety of a parent.

In other respects, reference is made to the comment on no. 19.

VI. Investigation, prosecution, procedural law and protective measures

A. General obligations and immediate response, prevention and protection (Articles 49 and 50)

2. Effective investigation and prosecution

53. GREVIO strongly encourages the German authorities to take legal or other measures to decrease the processing time by the prosecution services of cases of violence against women and domestic violence covered by the Istanbul Convention; to ensure that forensic evidence is ordered not only in cases of sexual violence, but also in domestic violence cases; and to ensure that audiovisual recordings of testimonies are made use of in a sensitive manner and nationwide (paragraph 302).

Short processing time by the prosecution services of cases of violence against women and domestic violence is an important concern. Some German Länder have set up special departments with particular expertise to make prosecution of these cases even more efficient. However, this falls within the exclusive competence of the Länder.

Audio-visual interrogation of a victim of domestic violence is already possible and is practised in suitable cases under certain conditions. However, it must be ensured

that the principle of immediacy is not undermined.

With regard to the topics of (sexualised) violence and abuse, there are currently more than 30 guidelines that address these important aspects in varying depth and are aimed at different target groups (adults - women, men and diverse - as well as children/adolescents).

In particular, the following guidelines for adults should be mentioned with regard to the diagnosis of sexualised violence:

- S1 guideline "Medical interviewing, examination and follow-up of women after alleged sexual violence".
- S2k guideline "Diagnosis and treatment of acute consequences of psychological traumatisations".

The following guideline focuses, in particular, on the area of child and youth protection:

- S3 guideline "Child maltreatment, abuse, neglect with the involvement of youth welfare and education (child protection guideline)".

To ensure that forensic evidence is collected in a timely manner, women have the possibility to get free and anonymous collection of these evidence irrespective of their intention. So, this will aid in the investigation, independently of when the woman filed a criminal complaint.

3. Conviction rates

54. GREVIO strongly encourages the German authorities to analyse the handling of criminal cases along the criminal justice chain from law-enforcement agencies to courts, relying on data, targeted research and case law, in order to identify and address the underlying causes of attrition, to identify possible systemic gaps in the institutional and judicial response to violence against women, and to make use of the findings to create evidence-based policies and/or make any necessary changes to legislation or practice (paragraph 305).

Reference is made to the comments on nos. 12 and 44.

B. Emergency barring orders (Article 52)

56. GREVIO strongly encourages the German authorities to make use of emergency barring orders more frequently, in order to protect the right to safety of women victims of domestic violence and their children, including by enabling children to benefit from emergency barring orders and by ending the practice of allowing for exceptions to prohibitions on contact of the abusive parent with his child for the duration of the emergency barring order (paragraph 316).

57. In order to review the implementation of emergency barring orders, GREVIO strongly encourages the German authorities to collect administrative data on 1) the numbers of such orders issued by the police; 2) the number of perpetrators who did not comply with the orders; and 3) the number and type of sanctions applied as a result of non-compliance (paragraph 317).

58. GREVIO urges the German authorities to take the necessary measures to systematically take into consideration the safety concerns of women victims of domestic violence and their children, on a case-by-case basis, when deciding on rights of contact for the duration of orders issued under the Act on Protection from Violence (paragraph 324)

59. GREVIO strongly encourages the German authorities to take the necessary measures to ensure women victims of domestic violence are proactively informed of the legal possibilities of obtaining protection orders, including women asylum seekers living in reception facilities, as well as women and girls victims of forced marriage and female genital mutilation (paragraph 325).

60. GREVIO strongly encourages the German authorities to ensure the application of the Act on Protection from Violence to women with disabilities living in institutions and to women asylum seekers living in reception and accommodation facilities (paragraph 326).

Recommendation 58:

When deciding on rights of access for the duration of orders under the Protection against Violence Act, the current law also requires that the safety concerns of women who are victims of domestic violence and their children be taken into account on a case-by-case basis. If there is no temporary exclusion of contact, this is done, for example, by regulating contact in such a way that there are no encounters. In the event of violations, an imprisonment or a fine may be imposed.

Recommendation 60:

Since the Protection against Violence Act is general and at least section 1 applies in any location, it also applies in institutions where persons with disabilities live. This is explicitly pointed out in the information brochures on the subject of domestic violence published by the federal ministries. The same applies to female asylum seekers living in reception and accommodation facilities.

E. Investigations and evidence (Article 54)

61. GREVIO encourages the German authorities to ensure that Article 68a of the Code of Criminal Procedure is applied in practice in line with the requirements of Article 54 of the Istanbul Convention, and to train judges in that respect (paragraph 329).

Section 68a of the Code of Criminal Procedure strikes a reasonable balance between the protection of the rights and interests of the witness and the need to ascertain the truth. This constitutes a sufficient implementation of Art 54.

In other respects, reference is made to the comment on no. 19.

F. Ex parte and ex officio proceedings (Article 55)

2. Victim support in legal proceedings

62. GREVIO strongly encourages the German authorities to take legislative or other measures to ensure that governmental and non-governmental organisations and domestic violence counsellors are able to assist and/or support victims, upon their request, during investigations concerning any of the offences established in accordance with the Istanbul Convention (paragraph 335).

Germany has already enacted a large number of measures. For example, there is the possibility for victims to receive psychosocial support during the process under certain circumstances.

G. Measures of protection (Article 56)

63. GREVIO encourages the German authorities to ensure that all measures in place to protect victims during investigations and judicial proceedings are implemented accordingly, and in relation to victims of all forms of violence covered by the Istanbul Convention. Data collection and research on the implementation of these measures and their effectiveness should be carried out regularly, including from a victim's perspective (paragraph 337).

Reference is made to the comments on nos. 12 and 44.

VII. Migration and asylum

A. Residence status (Article 59)

64. GREVIO strongly encourages the German authorities to enable all women in Germany, irrespective of the nature of the residence permit of their abusive sponsoring spouse, to apply for an independent residence permit. Furthermore, GREVIO encourages the German authorities to enable, through legislative and other measures, women and girls forced into marriage abroad to exercise their right to return, notably by offering a broad understanding of the requirement of "guaranteed reintegration" (paragraph 351).

Titles for family reunification are basically characterised by accessoriness, i.e. a dependence on the title of the original beneficiary. This results from the fact that the family is to live together in Germany. If the title of the original beneficiary may not be extended, the family should also leave the country together. Here, too, there should be no separation. If married women affected by violence have a right of residence that they do not derive from their spouse, for example because they are recognised as beneficiaries of protection, an independent right of residence does not have to be granted, as they are already entitled to residence on their own.

B. Gender-based asylum claims (Article 60)

1. Gender-sensitive asylum determination procedure

65. GREVIO strongly encourages the German authorities to (paragraph 362):

- a. establish nationwide, uniform guidelines on procedures and criteria regarding the identification, in the asylum determination procedure, of women who have been victims of gender-based violence;
- b. ensure that all those involved in the asylum processes (interviewers, interpreters, lawyers) receive adequate training on gender-based persecution and gender-based violence;
- c. ensure the systematic provision of information to asylum-seeking women about their rights and grounds for asylum, prior to or in the context of the first interview with the Federal Office for Migration and Refugees (BAMF). This should include information provided by independent support services for asylum-seeking women on the possibility to request a female case worker and interpreter and to apply for asylum in their own capacity, as well as on the availability of legal counselling;
- d. incorporate specific gender-sensitive questions into the standard procedure for interviews in order to systematically assess whether a female asylum seeker has

been exposed to or is at risk of gender-based persecution.

a) The internal guidelines include obligatory instructions in the context of gender-specific persecution in different chapters. Various country reports and country of origin guidelines - including statements on gender-based violence - are also available to the case officers. Furthermore, the Federal Office for Migration and Refugees has revised and updated its concept for identifying vulnerable persons in the asylum procedure.

b) The Federal Office for Migration and Refugees ensures that case officers are trained in identifying and dealing with victims of gender-based violence during the asylum procedure. All employees are sensitised and receive mandatory training according to their function in dealing with vulnerable persons, including victims of gender-based violence. The training also includes the different forms of need for protection, such as gender-specific violence. The Federal Office for Migration and Refugees also offers training courses for different countries of origin. In addition, employees receive an intercultural diversity training. The Federal Office for Migration and Refugees deploys specially trained case officers for particular vulnerable groups such as victims of gender-specific persecution. These specially trained case officers have received additional training and have special knowledge with regard to the specific needs of the respective vulnerable group. They are trained according to uniform European standards recommended by EUAA as well as group-specific national basic and advanced training in cooperation with NGOs.

c) The Federal Office provides asylum procedure counselling ahead of the interview and the asylum application at 45 locations. In the future, the asylum procedure counselling shall be provided by NGOs with state funding. The Federal Government is currently working on its implementation.

As part of the initial briefing, applicants are informed in their language about the asylum procedure and about their rights and obligations in the procedure after submitting their application. The briefing includes information about the possibility of being interviewed by a specially trained case officer and an interpreter of the same gender.

d) The internal guidelines include obligatory instructions in the context of gender-specific persecution in different chapters. Various country reports and country of origin guidelines - including statements on gender-based violence - are also available to the case officers.

2. Accommodation

66. GREVIO urges the German authorities to ensure that all women and girls seeking asylum (paragraph 369):

- a. *are offered adequate and safe accommodation through, among other things, the screening for vulnerabilities and the implementation of standard protocols for the prevention of and protection from gender-based violence in reception facilities;*
- b. *are granted access, de jure and de facto, to specialist support services and to counselling for experiences of gender-based violence.*

Within the German federal system, the responsibility for accommodating refugees lies with the Länder and the municipalities. Since 2019, the Asylum Act obligates the Länder to ensure the protection of women and vulnerable groups in receiving accommodation through “appropriate measures”. In 2016, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ), together with UNICEF and national and international CSOs, launched the “Joint Initiative for the Protection of Refugees in Refugee Accommodation Centres” to improve the protection, care and support of children, women and vulnerable persons living in refugee accommodation and to contribute to their well-being and integration. In April 2022, the fourth edition of the “Minimum Standards for the Protection of Refugees in Refugee Accommodation Centres” was published with annexes on the implementation of the minimum standards for LGBTI* refugees and migrants, implementation for refugees and migrants with disabilities and implementation for refugees and migrants suffering from traumatic disorder (<https://www.bmfsfj.de/resource/blob/184702/8c9c4cf873963d1ffcb51d1370222d1a/minimum-standards-for-refugees-and-migrants-english-data.pdf>). The “Minimum Standards for the Protection of Refugees in Refugee Accommodation Centres” are non-binding, but serve as guidelines for the development, implementation and monitoring of individual protection plans. The Federal Ministry for Family Affairs, Senior Citizens, Women and Youth funds several projects to support the Länder and refugee accommodations in the implementation of measures to protect against violence, for example, by funding multipliers for the protection of refugees and migrants in refugee accommodations. In addition, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth funds the two-year model project “BeSafe” (2021-2022). The model project, which is being implemented in two reception facilities and two psychosocial centres in cooperation with the Ministry for Children, Family, Refugees and Integration of the State of North Rhine-Westphalia and the Senate for Social Affairs, Youth, Integration and Sport of the Free Hanseatic City of Bremen, aims to develop a strategy to identify the special reception needs of persons in need of protection. The project is being carried out by the Federal Association of Psychosocial Support Centres for Refugees and Victims of Torture (BAfT) in cooperation with the Rosa Strippe Association.