

Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings



CP(2026)03

**Report submitted by the authorities
of Germany
on measures taken to comply with
Committee of the Parties Recommendation
CP/Rec(2024)03 on the implementation
of the Council of Europe Convention
on Action against Trafficking in Human Beings**

Third evaluation round

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Federal Ministry
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Women and Youth

Measures Taken by Germany in Response to Recommendation CP/Rec(2024)03 on the Implementation of the Council of Europe Convention on Action Against Trafficking in Human Beings

3rd Thematic Evaluation Round

Access to Justice and Effective Remedies for Victims of Traffick-
ing in Human Beings

Berlin, June 2026

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List of Acronyms

BAFA	Federal Office for Economic Affairs and Export Control
BAMF	Federal Office for Migration and Refugees
BAKA	Federal Criminal Police Office
BMAS	Federal Ministry of Labour and Social Affairs
BMF	Federal Ministry of Finance
BMBFSFJ	Federal Ministry for Education, Family Affairs, Senior Citizens, Women and Youth
BMJV	Federal Ministry of Justice and Consumer Protection
BMWE	Federal Ministry for Economic Affairs and Energy
BRM	Bilateral Referral Mechanism
DGB	German Trade Union Confederation
DIMR	German Institute for Human Rights
EMPACT	European Multidisciplinary Platform Against Criminal Threats
FKS	Unit for Financial Control of Undeclared Work
GDolmG	Courts Constitution Act
GHG	Violence Support Services Act
GVG	Courts Constitution Act
GZD	General Customs Administration
ICT	Information and Communication Technology
INRMTHB	Independent National Rapporteur Mechanism on Human Trafficking
ISF	Internal Security Fund
JIT	Joint Investigative Team
KKG	Child Protection Act
KOK	German NGO Network against Trafficking in Human Beings
LkSG	Act on Corporate Due Diligence in Supply Chains
NAP	National Action Plan
NAP A/Z	National Action Plan against Labour Exploitation and Forced Labour
NAP THB	National Action Plan to Prevent and Combat Trafficking in Human Beings and Protect Trafficked Persons
NPP	Non-Punishment Principle
NRM	National Referral Mechanism
OCGs	Organised Crime Groups

SchwarzArbG	Act to Combat Undeclared Work and Unlawful Employment
Service Centre	Service Centre against Labour Exploitation, Forced Labour and Human Trafficking
SGB II	Social Code Book II
SGB III	Social Code Book III
SGB X	Social Code Book X
SGB XIV	Social Code Book XIV
StGB	Criminal Code
StPO	Code of Criminal Procedure
THB	Trafficking in Human Beings
UBSKM	Independent Federal Commissioner Against Child Sexual Abuse
UMA	Unaccompanied Minor Foreign Nationals
VSSA	Violence Support Services Act
ZPO	Code of Civil Procedure

Preamble

Since the publication of the GRETA Report on Germany (GRETA(2024)07) on 7 June 2024, the Federal Government, in close cooperation with the Länder, civil society organisations and relevant stakeholders, has intensified its efforts to strengthen the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings. Particular emphasis has been placed on strengthening a national referral mechanism and establishing a national focal point for victims of trafficking in human beings, as well as on the draft law aimed at further improving the legal framework for combating trafficking in human beings (THB) and protecting its victims, in line with Recommendation CP/Rec(2024)03.

This report outlines the measures taken at both federal and Länder level following the adoption of the GRETA recommendations on 21 June 2024. It covers a period marked by significant developments, including the adoption of two National Action Plans (one on THB and one exclusively addressing labour exploitation and forced labour), as well as the establishment of the Independent National Rapporteur Mechanism on Human Trafficking.¹

In Germany's federal system, the investigation and prosecution of offences related to trafficking in human beings, as well as the provision of protection and support services for victims, fall primarily within the competence of the Länder. Given the wide range of anti-trafficking measures implemented across all 16 Länder, a comprehensive overview of Länder-level activities is provided in a dedicated annex (Annex 1). The present report therefore focuses on overarching responsibilities and national frameworks, while referring to selected examples of concrete implementation measures contained in the annex.

Efforts to combat trafficking in human beings in Germany, particularly with regard to victim protection and assistance, are carried out in close partnership with specialised counselling centres and non-governmental organisations. The contribution of these actors is indispensable to these efforts. In this context, the cooperation with the KOK – German NGO Network against Trafficking in Human Beings is of central importance for both the Federal Government and the Länder. This report highlights selected activities of KOK e.V. and its member organisations, which make a substantial contribution to the overall anti-trafficking framework and are partly supported through federal funding.

In addition, ECPAT e.V., an international organisation dedicated to combating the sexual exploitation and trafficking of children and which is funded by the Federal Ministry for Education, Family Affairs, Senior Citizens, Women and Youth, has contributed to this report. The Service Centre against Labour Exploitation, Forced Labour and Human Trafficking (Service Centre), funded by the Federal Ministry of Labour and Social Affairs, also supported the preparation of this report. The Service Centre, KOK e.V. and ECPAT e.V. all operate independently and are not part of governmental structures.

For the first time, the Independent National Rapporteur Mechanism on Human Trafficking has also contributed to this report, thereby contributing additional expertise.

¹ *** Please note that this report only contains information on developments that have occurred since Germany's responses of January 2023 and the GRETA report of June 2024. Consequently, where no information is provided with regard to a particular recommendation, this should not be interpreted as meaning that no measures have been taken in that area. Rather, it indicates that there have been no new developments to report since the above-mentioned reporting period. ***

Part I: Urges

1. National Action Plans

“In order to ensure that action to combat THB is comprehensive and involves all stakeholders, GRETA once again urges the German authorities to develop a comprehensive national action plan or strategy against THB which addresses all forms of exploitation”

The National Action Plan for the Prevention and Combating of Human Trafficking and the Protection of Victims (*Nationaler Aktionsplan zur Prävention und Bekämpfung des Menschenhandels und zum Schutz der Betroffenen – NAP THB*) was adopted in December 2024. It comprises 126 concrete measures at the federal level and will remain in effect until the end of 2028. The objective of the NAP THB is to strengthen victim protection and support. Particular attention is given to groups at increased risk of becoming victims of THB, including women in precarious situations, children and adolescents, as well as persons affected by displacement and migration. The English version is available here: <https://www.bmbfsfj.bund.de/resource/blob/258214/1dbf23a291e87ad569dadbb77e97c369/nationaler-aktionsplan-menschenhandel-englische-version-data.pdf>

The implementation of the NAP THB is supported by a monitoring mechanism. The first monitoring report, with a reference date of 31 December 2025, will be published in the near future.

To facilitate coordination with the Länder regarding the police measures included in the NAP THB and to promote dialogue among police stakeholders, the Federal Ministry of the Interior established a temporary federal-state police project group comprising representatives from relevant federal and Länder authorities.

In addition, on 12 February 2025, the German Federal Government adopted a National Action Plan against Labour Exploitation and Forced Labour (*Nationaler Aktionsplan gegen Arbeitsausbeutung und Zwangsarbeit – NAP A/Z*). The Federal Ministry of Labour and Social Affairs acted as the lead ministry. For the first time, the Federal Government has adopted a national strategy focused on preventing and combating labour exploitation and forced labour.

By doing so, the Federal Government is complying with international obligations arising from the Protocol of 2014 to the ILO's Forced Labour Convention (Convention No. 29). As a pathfinder country within the Alliance 8.7, Germany is turning its commitments under the NAP A/Z into action.

The 83 measures contained in the NAP A/Z focus on various objectives, including the promotion and expansion of targeted low-threshold services providing information, advice and support to workers; cross-border networking and international cooperation between labour market actors; and raising awareness in a targeted manner among public authorities, social partners and enterprises of existing shortcomings. Measures in the four action areas of labour recruitment, workers' rights and their enforcement, working conditions, occupational health and safety and state monitoring, as well as corporate responsibility aim to combat labour exploitation and forced labour more effectively.

In addition, the Länder have developed 125 measures against labour exploitation and forced labour for which they are responsible.

The implementation of the NAP A/Z commenced in February 2025. The NAP A/Z will be continuously further developed in cooperation with the Länder, social partners and civil society.

The English version of the NAP A/Z can be retrieved here: <https://www.bmas.de/EN/Services/Press/recent-publications/2025/national-action-plan-against-labour-exploitation-forced-labour-approved.html>

2. Compensation

“While welcoming the recent changes to the legislation on state compensation, GRETA urges the German authorities to make efforts to guarantee effective access to compensation for victims of human trafficking, in line with Article 15 (4) of the Convention, including by:

- *enabling all victims of trafficking, irrespective of their residence status, to effectively exercise their right to compensation as a priority in criminal proceedings, or in civil and labour law proceedings;*
- *making full use of the legislation on the freezing and forfeiture of assets, as well as international co-operation, to secure compensation to victims of THB (see paragraphs 97 and 102).”*

The Social Code Book XIV (SGB XIV), which entered into force on 1 January 2024, recognises psychological violence as a form of violence eligible for social compensation and clarifies that all cases of THB are covered by the definition of psychological violence. Foreign victims are also entitled to benefits; since 1 July 2018, they can claim these under the same conditions as German nationals. Compensation benefits include, inter alia, medical care, financial compensation and welfare benefits. In addition, victims, their (surviving) relatives and persons closely related to them are entitled to support from a trauma outpatient clinic. Interpreter and translation costs are also covered. Victims may apply for benefits for social compensation under the SGB XIV through administrative proceedings are conducted separately from criminal proceedings.

Benefits of social compensation under SGB XIV can be accessed through an administrative procedure that takes place independently of the criminal proceedings. Therefore, victims can obtain benefits of social compensation, whether or not the perpetrator is able to pay. If the perpetrator has already paid the compensation that was awarded to the victim by the criminal or civil court, the compensation awarded in criminal proceedings can be deducted from the social compensation benefits.

Further, victims have the right to seek compensation in criminal proceedings (if the claim falls under the jurisdiction of the ordinary courts and is not yet pending before another court) under section 403 of the StPO.

In any case, legal aid is granted upon application and under the same provisions as apply in civil litigation, as soon as public charges have been preferred (section 404 (5) of the StPO). In particularly severe cases of THB, legal aid is granted without a means test (see section 397a of the StPO, as well as section 6). This also enables victims to exercise their right to compensation.

Since the entry into force of SGB XIV, which replaced the previous Victims’ Compensation Act, the German NGO Network against Trafficking in Human Beings (KOK) has implemented various measures to support the application of SGB XIV in cases of THB. In 2024, KOK, together with two other women’s rights organisations, developed a practical guide specifically designed to provide staff at specialist counselling centres with an initial overview of the provisions of the new Social Compensation Act and to explain how they can best support victims during the application and benefits process. The guide was funded by the BMBFSFJ and it is available online in German (link: <https://www.kok-gegen-menschenhandel.de/serviceangebote/publikationen/detail/sgb-xiv-das-neue-soziale-entschaedigungsrecht>).

In addition, a leaflet on social compensation law has been produced in German (link: <https://www.kok-gegen-menschenhandel.de/serviceangebote/publikationen/detail/soziale-entschaedigung-sgb-xiv-unter-stuetzung-fuer-betroffene-von-gewalt>).

Through a series of training sessions organised by the Service Centre against Human Trafficking, Forced Labour and Labour Exploitation in collaboration with KOK, awareness was raised among staff at social security offices responsible for SGB XIV regarding the issue of THB and the application of SGB XIV to victims of THB.

The FKS provides potential victims of THB and labour exploitation with information on regional specialist counselling centres/specialised NGOs (see section 11). These institutions, in turn, provide information on compensation payments from the perpetrator and state compensation.

This year, for example, the German Judicial Academy is once again offering training for judges and public prosecutors on “Victim Protection and Adhesion Proceedings”, which is open to judges and public prosecutors nationwide.

3. Non-Punishment Principle

“GRETA urges the German authorities to take further steps to ensure consistent application of the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so. Consideration should be given to amending section 154c(2) of the CPC and issuing of guidance to prosecutors and other relevant professionals on how to apply the non-punishment provision to victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so.”

Regarding the implementation of the non-punishment principle (NPP), Germany has taken further steps to address GRETA’s concerns. First, at the initiative of the Federal Ministry of Justice and Consumer Protection (BMJV), the Länder decided to amend the guidelines governing criminal and administrative fine proceedings. According to these amendments, public prosecutors should drop charges against victims of THB if they were compelled to commit a less serious offence. However, the agreed amendments to the guidelines must still be officially published before they enter into force and become binding on public prosecutors.

Moreover, the legal provisions relating to the NPP in the StPO have also been examined in the context of the current draft bill on THB. To further highlight and strengthen the NPP, a new provision was included in the draft bill (Section 154g StPO – Non-prosecution of victims of human trafficking or exploitation).

4. Protection of Victims (Use of Audio-Visual Equipment and Other Appropriate Methods)

“GRETA urges the German authorities to ensure that direct confrontation of victims and defendants in THB cases is avoided, to the extent possible, making use of audio-visual equipment and other appropriate methods.”

Several provisions of the German Code of Criminal Procedure provide for measures to ensure that there is no direct confrontation of victims and defendants.

For example, video and audio recordings of the examination of a witness may be made, which may, under certain circumstances, substitute examination of the witness at the main hearing (sections 58a, 255a StPO).

Moreover, under certain circumstances (e.g. the imminent risk of serious detriment to the wellbeing of a witness), the court may order that the witness remain in a different location during the examination and the testimony is transmitted simultaneously to the courtroom via audio-visual means (section 247a StPO).

In cases of serious risk to the wellbeing of the witness, who is to be questioned by a judge prior to the trial, the judge may decide that the prosecutor, the defendant and their lawyer, e.g. those who have a right of attendance (section 168c StPO), must remain in a separate room to which the interview is transmitted simultaneously (section 168e StPO).

To the extent that the law allows discretion, it is for the independent judiciary to decide whether to make use of these measures.

5. Data Collection

“GRETA once again urges the German authorities to set up and maintain a comprehensive and coherent statistical system on THB by compiling reliable statistical data from all main actors, including specialised NGOs, on measures to protect and promote the rights of victims.”

The Federal Situational Picture on Human Trafficking and Exploitation, compiled annually by the BKA, describes the current findings on the situation and developments in the areas of THB and exploitation in Germany within the meaning of the Criminal Code (StGB). The statements are based on the reports of the State Criminal Police Offices, the Federal Criminal Police Office, the Federal Police and the Financial Control of Undeclared Work of the Customs Administration. These reports concern investigation proceedings completed in the reporting year and submitted to the competent public prosecutor's offices in the relevant areas of crime, involving crime scenes in Germany.

The latest version can be accessed here:

<https://www.bka.de/SharedDocs/Downloads/EN/Publications/AnnualReportsAndSituationAssessments/TraffickingInHumanBeings/traffickingInHumanBeingsReport2024.html>

Additionally, the INRMTHB conducts regular bilateral exchanges, consultations and workshops with actors at federal and Länder level to improve data collection and work towards coherent statistics on THB in Germany.

Furthermore, since the publication of the first evaluation report on the KOK data tool in October 2021, the KOK has continued to publish comparable reports on a yearly basis. The reports contain an evaluation of the cases of THB and exploitation registered at specialised counselling centres. The report on data registered in 2024 contained an analysis of 659 cases registered with the specialised counselling centres that participate in the data collection. It provides information on the victims (e.g. age, gender, origin) and the type of support provided.

The KOK data report thus complements the findings from other key sources, in particular the Federal Criminal Police Office's (BKA) Federal Situation Picture on Human Trafficking (focus: criminal prosecution). While the data compiled in the annual situation report on THB and exploitation published by the BKA focuses on cases of THB that have led to criminal investigations, the data compiled in the report published by the KOK focus on cases registered with specialised counselling centres – including those in which no criminal investigation was conducted. When compared, the two reports continue to show clear discrepancies – for example with regard to the main countries of origin of trafficked persons – which implies that specialised counselling centres are in touch with and are aware of cases that are not directly visible to the authorities. This underlines the importance of data available to civil society organisations in drawing a clear picture of the phenomenon of THB and the impact of measures aimed at combating THB in Germany.

The KOK report on data registered in 2024 is available online in English:

https://www.kok-gegen-menschenhandel.de/fileadmin/user_upload/medien/Publikationen_KOK/KOK_Datenbericht_2025_e_Bericht_web.pdf.

The INRMTHB draws on data from both the KOK report and the BKA's national situation report. To avoid duplication of effort and maximise synergies, the INRMTHB maintains regular contact with both institutions. The national rapporteur also collects and analyses data from various other sources, such as its own enquiries

with the Länder or statistics from the Financial Control of Undeclared Work (FKS). Thematically, the report also covers a significantly broader scope than the KOK data report and the BKA's national situation report. Thus, in addition to the topics of victim protection and criminal prosecution, aspects such as compensation, prevention and the support landscape in Germany, are also statistically analysed. The report also goes beyond the presentation and analysis of data and develops concrete recommendations for measures at structural and institutional level, for the implementation of victims' rights, for the legislative level and for improving the data situation.

An English summary is available here: <https://www.institut-fuer-menschenrechte.de/publikationen/detail/summary-monitoring-report-human-trafficking-in-germany>.

6. Identification of Victims of THB

“GRETA once again urges the German authorities to make further efforts to ensure that all victims of trafficking are identified as such and can benefit from the assistance and protection measures contained in the Convention, in particular by:

- *setting up and further developing co-operation agreements in all Länder which cover all forms of THB and follow a multi-agency approach to victim identification;*
- *ensuring that, in practice, the identification of victims of THB, is not linked to the prospects of the investigation and prosecution;*
- *paying increased attention to the identification of victims of trafficking among asylum seekers and migrants, including by recruiting a sufficient number of staff, interpreters and cultural mediators, and providing them with training on THB. In this respect, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;*
- *providing specialised counselling centres involved in the identification of victims of trafficking amongst asylum seekers with sufficient resources to enable them to fulfil this task;*
- *review the application of the Dublin Procedure to presumed victims of THB and conduct risk assessments in order to prevent victims being returned to the country where they first applied for asylum, but where they face the risk of being re trafficked.”*

Enhancing Referral Structures

The Federal Government is reviewing the tools and structures available in Germany for the identification and referral of victims of THB in order to implement the EU Anti-Trafficking Directive 2011/36/EU, as amended by Directive (EU) 2024/1712 of 13 June 2024. To this end, a sub-working group within the framework of the Federal Government-Länder Working Group on Combating Human Trafficking (hosted by the Federal Ministry for Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ)) was established in June 2025, bringing together representatives of the Federal Government, the Federal Criminal Police Office, the State Criminal Police Offices, the judiciary, the Financial Control of Undeclared Work, specialised counselling centres and the Länder. The sub-working group has developed specific recommendations for the Federal Government, which were submitted to the Federal Government in October 2025. Based on these recommendations, the Federal Government has established a working group, mandated to develop minimum standards for the identification, support and referral of (potential) victims of THB. The minimum standards will provide a framework for further action on the identification and referral of victims of THB.

Identification of Child Victims of THB

In addition to, and in close cooperation with the above-mentioned working group on minimum standards, the National Council against Sexual Violence against Children and Young People organised expert discussions in September 2025 on combating trafficking and exploitation of children, as well as with the state youth and family ministries, state youth welfare offices and local authority associations, to discuss the requirements implementation for the implementation of a NRM focused on children. This implies improving existing forms of cooperation within the child and youth welfare system, in order to combat all forms of THB with all relevant stakeholders and all forms of THB concerning minors. The aim is to improve early identification of and assistance to minor victims of THB. A further meeting with the state family ministries and local youth welfare offices is planned in June 2026 to reach an agreement on minimum standards for a national referral mechanism focused on minors.

In addition, ECPAT has received funding since 2018 to implement the Federal Cooperation Concept (<https://bkk.ecpat.de/>). Among other activities, ECPAT provides advice and support to the Länder in establishing cooperation agreements at Länder level and in establishing regional networks.

Decoupling Victim Identification from Investigation and Prosecution Prospects

As far as the asylum procedure is concerned, the Federal Office for Migration and Refugees (BAMF) has implemented its identification concept, which also includes victims of THB. The Länder have their own identification concepts and measures regarding the reception of asylum seekers. It is not possible to direct or advise the Länder as envisaged in the recommendation. The Länder are responsible for identification and protection regarding the reception procedures that do not necessarily overlap with the asylum procedure.

Moreover, the identification of victims of THB in the asylum procedure is not linked to criminal investigation and prosecution. Persons identified as victims or re-victimised upon returning to the country of origin or habitual residence, are granted asylum or international protection.

Identification of Victims of THB among Asylum Seekers and Migrants

Germany pays particular attention to the identification of victims of THB. The BAMF employs so-called “special representatives for vulnerable persons”, including special representatives for victims of THB. These special representatives are experienced, have sufficient expertise (e.g. interviewing techniques, in-depth knowledge regarding the phenomenon, as well as prevalent country of origins) and are sensitised to handle asylum procedures involving (possible) victims of THB. Regardless of the special representatives, the BAMF assumes that every employee may encounter a victim of THB throughout the asylum procedure. As a result, every employee is required to attend training on the phenomenon of THB. Moreover, employees processing asylum applications must attend continuous training; this also addresses interviewing techniques, including the creation of an approachable atmosphere, and aims to update the relevant country-of-origin information regarding THB (origin, phenomenon, re- or repeated victimisation). In addition, personnel designated to become special representatives for THB are required to attend EUAA-coordinated training on THB. GRETA’s Guidance Note on the entitlement of victims of THB is taken into account in these training sessions.

The above-mentioned measures are also applied in the Dublin procedure. In such cases, a special representative for THB is regularly consulted, who re-examines the facts of the case and issues an opinion as to whether the person concerned is again at risk of being trafficked in the responsible Member State (keyword: “re-victimisation”).

7. Safe Accommodation

“GRETA once again urges the German authorities to provide adequate assistance, including safe accommodation, adapted to the specific needs of victims, including male and transgender victims of THB.”

The Violence Support Services Act (VSSA) will ensure a legal entitlement to protection and counselling for women (and their children) affected by gender-based or domestic violence. Safe accommodation will be provided in shelters or other specialised services, such as shelter apartments. According to the Istanbul Convention (see article 3(c)), the personal scope of the VSSA extends to trans* women.

In July 2024, the INRMTHB published a qualitative interview study on the availability of safe and adequate accommodation for all victims of labour exploitation. It includes an analysis of the national and European legal frameworks. The results were presented at a press conference, as well as at several conferences and round tables. The INRMTHB provided advice to Länder authorities on this issue.

For further developments, please refer to section 23.

8. Identification of, and Assistance to, Child Victims of THB

“GRETA urges the German authorities to:

- ensure that relevant stakeholders (police, public prosecutors, immigration officials, social workers, child-care services, health-care professionals and teachers) take a proactive approach and increase their outreach work to identify child victims of THB, paying increased attention to online trafficking and forms of THB other than for sexual exploitation;*
- ensure that child victims of human trafficking, including unaccompanied and separated children, are provided with accommodation which creates a safe and enabling environment for children, paired with enough adequately trained staff, and have access to health care and education;*
- continue to take actions to reduce the risk of unaccompanied and separated children going missing.”*

According to section 4 (5) of the Child Protection Act (KKG) in conjunction with section 71(1), sentence 6 of the Social Code Book X (SGB X), members of the customs administration (FKS) are authorised to inform the responsible youth welfare offices if, in the course of their official duties, they become aware of significant indications that the welfare of a child or young person is at risk, necessitating intervention by the youth welfare office. Significant indications of risk may exist in particular where suspicion exists that a person living in the same household as a child or young person, or who has or is expected to have regular contact with them, has committed a crime, including, but not limited to THB, forced labour, or labour exploitation.

In October 2025, the INRMTHB published an analysis on children affected by THB and exploitation in Germany. The analysis covered legal provisions on protection, identification and assistance and interviews were conducted with specialised counselling centres working with minors. As a result, protection gaps were identified and recommendations derived.

Link: <https://www.institut-fuer-menschenrechte.de/publikationen/detail/durchs-raster-gefallen>

Furthermore, in 2025, ECPAT has published a study and fact sheet in German and English to raise awareness, share knowledge and provide recommendations for action for political decision-makers, the private sector and specialised agencies and other stakeholders on “pocket money dates: sexual exploitation of children and the role of online advertising platforms”. A study on trafficking in children in the digital space and another

study on financial transactions related to sexual violence against children in the digital space (including livestreaming and sexual extortion) will be published in 2026.

BMBFSFJ is funding ECPAT to organise training sessions to inform about child trafficking for relevant stakeholders (police, public prosecutors, immigration officials, social workers, childcare services, health-care professionals and teachers). BMBFSFJ also funds ECPAT Germany to operate a national reporting platform (<https://nicht-wegsehen.net/>) where travellers, professionals and individuals can submit reports of sexual exploitation, sexual violence and trafficking in children to the Federal Criminal Police and/or ECPAT Germany anonymously. ECPAT is not a counselling centre, but acts as a referral point. In addition to offering advice on the best course of action, reports are forwarded to the BKA and/or partner organisations within the national and international ECPAT network.

BMBFSFJ has set up a commission of experts in autumn 2025. The commission's goal is to develop a strategy for “protecting children and young people in the digital world” with specific recommendations for action for the relevant stakeholders, such as the Federal Government, the Länder and civil society. Among other things, the commission will address the necessary conditions for a safe digital environment for children and young people, as well as the health consequences of media consumption and strengthening media literacy among children, young people, parents and professionals. The commission will also examine the introduction of a minimum age.

Together with the Independent Federal Commissioner Against Child Sexual Abuse (UBSKM), the BMBFSFJ has been implementing an awareness and engagement campaign against sexual violence against children since 2022. In 2026, the campaign will focus on child sexual abuse and exploitation online. It aims to convey to target groups that digital sexual violence affects everyone and that adults are responsible for the protection of children and adolescents, also online.

Child and youth welfare services ensure that unaccompanied minors are housed, cared for and supported in accordance with the best interests of the child. The Act on Improving the Housing, Care and Support of Foreign Children and Adolescents, which entered into force on 1 November 2015, amended Social Code Book VIII (SGB VIII) accordingly (sections 42a et seq.). The child and youth welfare services ensure the protection of unaccompanied minors to the greatest extent possible – they have a safe haven in child and youth welfare facilities. The support and accommodation structures provided by child and youth welfare services in Germany are generally well received by unaccompanied minors.

To address the special needs of unaccompanied and separated minors, the BMBFSFJ is in close communication with the Länder and municipalities and supports them in managing these tasks.

The National Council against Sexual Violence against Children and Young People organised expert discussions on 22 September 2025 in the field of combating THB and the exploitation of children, together with the state youth and family ministries, state youth welfare offices and local authority associations, to discuss requirements for the implementation of a NRM focused on children. This supports the early identification and support of children and young people affected by THB. A further meeting with the family ministries and state youth welfare offices is planned in June 2026 to reach an agreement on minimum standards for a NRM focused on minors.

With regard to missing unaccompanied and separated minors, it should be noted here that the figures from the Federal Criminal Police Office reflect the number of missing persons reports filed and not the actual number of missing minor refugees. The data is of very limited reliability due to various issues, such as duplicate entries. It is not possible to conduct an accurate survey of the number of unaccompanied and separated minors actually missing. However, the unaccompanied and separated minors report for the 2021/2022 reporting period already noted that the Federal Government has taken decisive measures through the Second Data Exchange Improvement Act. Among other measures, youth welfare offices were legally required to ensure that, in cases of doubt regarding identity, unaccompanied foreign minors are immediately subjected to identification procedures by one of the authorities competent of registering them. Furthermore, the recommendations for action regarding the handling of unaccompanied minors issued by the Federal Working Group of the State Youth Welfare Offices explain in detail how the responsible youth welfare offices should proceed in cases of missing persons involving unaccompanied minors.

9. Recovery and Reflection Period

“GRETA once again urges the German authorities to ensure, in compliance with the obligations under Article 13 of the Convention, that all possible foreign victims of trafficking, including those falling under the Dublin Regulations, are offered a recovery and reflection period and are able to fully benefit from all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period.”

Specifically, the FKS informs potential victims of THB and labour exploitation about the possibility of taking advantage of the recovery and reflection period during inspections. Making use of the reflection period is not linked to an obligation to testify in court proceedings, but is independent of any willingness to testify.

At the level of local FKS offices, coordinators for the protection of victims of THB in connection with employment, forced labour and labour exploitation have been designated. These coordinators participate in special training and awareness-raising measures, support the other FKS officers in matters of victim protection and work to establish a regional network including law enforcement authorities, immigration authorities and counselling centres.

With regard to the asylum procedure, the BAMF grants the recovery and reflection period in the context of the Dublin Regulation. However, this depends on the presumption that the claim – that the applicant fell victim to THB in the EU Member State – has been found to be credible and that a real risk of either re- and/or repeated victimisation is established.

Part II: Considers

10. Co-operation Agreements

“Stressing the obligation in Article 29(2) of the Convention to ensure co-ordination of policies and actions against THB, GRETA considers that the German federal and Länder authorities should take steps to ensure that all Länder have co-operation agreements on combating THB which involve all relevant stakeholders, address all forms of THB, and identify and assist victims of trafficking without discrimination. The aim should be to ensure greater coherence and effectiveness of the actions of all stakeholders across Germany in combating and preventing THB in all its forms.”

Besides strengthening existing cooperation structures, Germany is in the process of strengthening referral mechanisms. For further information, see section 6.

Various Länder have already introduced cooperation agreements which were modelled after the “Cooperation scheme for cooperation between specialised counselling centres and police for the protection of victims of THB beings for the purpose of sexual exploitation”.

An overview of cooperation agreements can be found here: <https://www.institut-fuer-menschen-rechte.de/das-institut/abteilungen/berichterstattungsstelle-zu-menschenhandel/nationaler-ver-weisungsmechanismus/saeule-1-identifizierung-und-schutz>.

One example of an agreement concluded since Germany’s last report to GRETA is a cooperation agreement between specialist counselling centres, the Main Customs Office Berlin and the Berlin Police. Similar agreements are being developed in the federal states of Bavaria and Lower Saxony (see section 21).

11. Right to Information

“GRETA considers that the German authorities should continue to make efforts to ensure that all presumed victims of trafficking, including children and those detected among asylum seekers and migrants, are pro-actively informed of their rights, including the right to a recovery and reflection period, the available support services and how to receive them, and the consequences of them being recognised as victims of trafficking, taking into account victims’ age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disabilities which may affect their ability to understand the information provided.”

In cooperation with specialised counselling centres and supporting bodies referred to in section 2(4) of the Act to Combat Undeclared Work and Unlawful Employment (SchwarzArbG), the FKS helps ensure that employees, particularly those potentially affected by exploitative working conditions, gain access to further information and legal advice.

The FKS provides potential victims of THB and labour exploitation with information on available support services (flyers from regional specialist counselling centres/specialised NGOs, contact information for counselling centres) or, after obtaining consent, forwards the contact details of potential victims of THB and labour exploitation to regionally responsible specialist counselling centres.

Furthermore, FKS officers inform potential victims of THB for the purpose of labour exploitation and forced labour about their rights during investigations, including the non-punishment principle and the recovery and reflection period.

To enable FKS officers to identify potential victims more effectively and ensure the officers are adequately informed about the rights of this vulnerable group of persons, officers are continuously sensitised and trained

on this topic. During the reporting period, this training was provided primarily via an e-learning tool rolled out in November 2024 (see also section 22), but also through in-person training in July 2025 for newly appointed coordinators for victim protection; as well as several online training sessions for FKS officers in 2024 in cooperation with the Service Centre against Labour Exploitation, Forced Labour and Human Trafficking (Service Centre) (see section 22 for more information).

The BMBFSFJ funds the “Power Up” project by ECPAT Germany. The aim of this project is to provide young people and future professionals basic knowledge of the organised structures of THB and exploitation through training courses and an awareness campaign, in order to help them recognise the dynamics and risk factors of THB involving children and young people. By engaging future professionals in this topic at an early stage, a foundation is laid that enables them to identify suspected cases at an early point in their future professional lives and to understand which steps need to be taken. The social media awareness campaign was developed in collaboration with young people and ran from October to December 2025 in partnership with influencers, particularly on TikTok and Instagram. A total of 850,000 views were generated. The funding period of this project is from 1 October 2024 to 30 September 2026.

The INRMTHB also provides information in this regard. In its handbook on implementing European standards on cooperation and referral in Länder cooperation agreements, published in February 2024, the INRMTHB presents the information rights of data subjects and the information obligations of state actors in a table on pages 39–42 (only available in German: <https://www.institut-fuer-menschenrechte.de/publikationen/detail/unterstuetzung-fuer-betroffene-von-menschenhandel-mindeststandards-fuer-die-zusammenarbeit-zwischen-behoerden-und-zivilgesellschaft>).

In the monitoring report, the INRMTHB recommends that victims be provided with comprehensive information about their rights (p. 96). In addition, the report contains a chapter on victims’ rights to information on compensation and legal protection (p. 131–141) (The full report is only available in German, but English Q&As and a summary are available: <https://www.institut-fuer-menschenrechte.de/en/monitoring/reports/monitoring-report-human-trafficking-in-germany>).

12. Qualified Interpreters

“GRETA also considers that the German authorities should take measures to increase the number of qualified interpreters who are sensitised to the issue of human trafficking and the vulnerabilities of victims, and to ensure their timely availability.”

Under section 185(1) of the Courts Constitution Act (GVG), persons participating in the hearing who do not have a command of the German language must be assisted by an interpreter. In order to translate during court hearings, interpreters must be sworn in. In most cases, interpreters have already been sworn in to work as a court interpreter at an earlier date; only in exceptional cases does an interpreter need to be sworn in ad hoc in the courtroom.

Under section 3(1) no. 6 of the Court Interpreters Act (GDolmG), a person is sworn in as a court interpreter if they possess the necessary specialist knowledge of German and of the language for which they are to be sworn in. A person is deemed to possess the necessary specialist knowledge if they have a basic knowledge of legal German and have passed the interpreting examination in Germany (set by a state or state-recognised examination board), or have passed another state or state-recognised examination qualifying them for the profession of interpreter (section 3(2) no. 1 GDolmG), or have passed an examination abroad which a competent German authority has recognised as being equivalent to an examination under no. 1 (section 3(2) no. 2 GDolmG). This ensures that only qualified interpreters are allowed to work in court proceedings.

The BAMF continuously strives to widen the pool of available languages. The BAMF constantly seeks to up-skill interpreters with regard to THB.

13. Legal Assistance and Free Legal Aid

“GRETA considers that the German authorities should make additional efforts to guarantee access to justice for victims of trafficking, in particular by ensuring that:

- legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement;*
- access to free legal aid for adult victims of labour exploitation under section 233 of the CC does not depend on proof of lack of financial means to pay for a lawyer.*
- victims of trafficking have effective access to free legal assistance in related fields, such as civil, labour and immigration law; - sufficient funding is provided for legal assistance to victims of trafficking;*
- sufficient funding is provided for legal assistance to victims of trafficking;*
- Bar Associations are encouraged to offer specialised training to lawyers assisting and representing victims of trafficking.”*

In criminal proceedings, legal aid must also be provided to adult victims of THB – including adult victims of labour exploitation and forced labour – regardless of financial need or proof of insufficient financial means for legal representation, if they are unable to adequately represent their own interests, section 397a(1) no. 5 StPO. Any inability to do so must be determined on the basis of injury- or victim-specific criteria, as this is in line with the spirit and purpose of the law.

In civil proceedings, legal aid is granted to persons who, on the basis of their personal and financial circumstances, are unable to bear the costs of legal proceedings, or can only bear them in part or in instalments, provided that the intended legal action or defence offers sufficient prospects of success and does not appear to be frivolous. The prospects of success are not subject to high requirements. This ensures that no one has to refrain from enforcing legitimate claims simply because they lack sufficient financial resources. It is a matter of fairness that the obligation to contribute to legal costs is based on the individual's financial situation. Legal aid is intended to enable the party in need to pursue legal proceedings, but not to leave them in a better position than a party who is not eligible for legal aid. If the case is won, the losing party bears the costs of the legal dispute and must also reimburse the prevailing party's legal costs, e.g. solicitors' fees. The decision on whether or not to cooperate with authorities or to make an official statement is irrelevant to the decision on the provision of legal assistance.

14. Psychological Assistance

“GRETA considers that the German authorities should guarantee timely access of victims of trafficking to psychological assistance, including by providing sufficient funding for the specialised counselling centres, and ensure that it is provided for as long as their individual situation requires, in order to help them overcome the trauma they have been through and achieve a sustained recovery and social inclusion.”

The Social Code Book XIV (SGB XIV) enables victims of THB, as well as all other victims of violence, to access the rapid assistance services that provide a low-threshold procedure for obtaining benefits under SGB XIV. Victims, as well as their relatives and closely related persons, are entitled to benefits from trauma outpatient clinics. In this context, trauma therapy is intended to prevent mental health disorders from developing or becoming chronic.

The Federal Ministry of Labour and Social Affairs (BMAS) is currently financially supporting a research project which, according to section 11 of the Regulation on Trauma Outpatient Clinics (SGB XIV), seeks to evaluate the existing networks of trauma outpatient clinics and to identify factors that can improve the establishment of networks between trauma outpatient clinics, the judicial system and other specialised victim support systems in Germany.

Regardless of this, mental health care in Germany is already highly specialised and covered by statutory health insurance. It includes psychiatric and psychotherapeutic services in both inpatient and outpatient settings, as needed.

15. Access to Work, Vocational Training and Education

“GRETA considers that the German authorities should strengthen effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training and job placement, raising awareness amongst employers, and the promotion of micro-businesses, social enterprises and public-private partnerships, including through state supported employment programmes, with a view to creating appropriate work opportunities for victims of trafficking.”

The German government is guided by the conviction that access to education and training, as well as integration or reintegration into the labour market, are the crucial levers for economic and social inclusion and for strengthening effective access to the labour market for victims of THB.

Exiting unemployment enables victims of THB, labour exploitation, and forced labour to participate in society and achieve economic independence.

For example, the following important measures offered by the central German labour market authorities, the Federal Employment Agency (*Bundesagentur für Arbeit*) and the job centres, are considered particularly noteworthy:

- potential analysis,
- individual counselling and placement services, and
- psychosocial counselling.

Germany also has a comprehensive system for the promotion of employment that is available to victims of THB subject to the requirements and conditions in the German Social Code Book III - Promotion of Employment (SGB III). The main goal of employment promotion is to counteract the emergence of unemployment, shorten its duration and improve or stabilise individual employability.

Various instruments of active labour market policy, set out in Chapter Three of the SGB III, are available for this purpose. During an initial consultation, individual professional and personal needs, characteristics and skills are determined (potential analysis), and a placement strategy is subsequently developed with the job seeker.

The counselling and placement activities of the employment agencies and job centres are supported by active labour market policies. A wide range of instruments is available for this purpose (for example, funding from the placement budget and measures for activation, career orientation and vocational integration). Their application is based on the individual support needs of the job seekers. Selected measures can facilitate job seekers' access to training and the labour market and identify, reduce or eliminate barriers to placement. Job seekers lacking the necessary qualifications for the labour market can be supported by various measures for

(continuing) vocational education and training. Employers can receive an integration subsidy when hiring individuals who face difficulties entering the labour market. Furthermore, the employment agency can support unemployed individuals in becoming self-employed.

In addition, especially with regard to victims of THB, in specie under the requirements and conditions in sections 7 et seq. of the German Social Code Book II - Basic Income Support for Job Seekers (SGB II), the psychosocial counselling under section 16a of the SGB II is a support service for people receiving SGB II benefits who have difficulty finding employment due to personal or social problems. Job centres can provide advice and referrals. The services are provided by municipal or independent organisations. The goal of this kind of assistance is to promote psychological stability, support coping with everyday problems and improve individual living situations to facilitate integration into the labour market. Financial support is also available in the form of social benefits under SGB II or housing allowance. For victims of THB who have been unemployed for a long time, this includes the possibility of re-entering the workforce through coaching, training and other instruments of the social labour market.

The Service Centre against Labour Exploitation, Forced Labour and Human Trafficking plans to run its first pilot training sessions with staff from job centres in North Rhine-Westphalia in 2026. The training aims to raise awareness of indicators of labour exploitation, forced labour and human trafficking and to support staff in identifying affected persons.

16. Criminal Law, Investigations, Prosecutions, Sanctions and Measures

“GRETA also considers that the German authorities should continue taking measures to:

- conduct a comprehensive assessment of the effectiveness of the criminal law provisions concerning THB and related offences. The authorities should be prepared to readjust on the basis of such an assessment the content and/or the application of the relevant provisions with a view to addressing any shortcomings identified;*
- ensure that the liability of legal entities for criminal offences is effectively implemented;*
- develop the legal framework to enable the use of technological developments to gather digital evidence and strengthen the awareness of the subject of digital and technology-facilitated THB among state and non-state stakeholders.”*

In October 2025, the BMJV published a first draft of a bill to strengthen the criminal prosecution of THB and sexual exploitation and to implement the updated EU Directive on preventing and combating trafficking in human beings and protecting its victims. The draft bill is intended to implement the amended European legal requirements for combating THB and fundamentally reform criminal law relating to THB. In order to implement the Directive, the definition of THB will be extended to include the exploitation of surrogacy, forced marriage and illegal adoption, and a general criminal liability for the intentional use of services provided by a victim of THB will be introduced.

Furthermore, the provisions on combating THB and sexual exploitation will be revised in terms of content and structure. The draft law takes into account experience gained in law enforcement practice and incorporates proposals made by academics. The aim is to strengthen the fight against THB in Germany and to hold perpetrators more consistently accountable.

Following consultation with the relevant ministries, federal states and associations, the BMJV published a revised draft bill in May 2026, which will form the basis for parliamentary debate and will hopefully lead to a timely conclusion of the legislative process.

The German legal system recognises the liability of legal persons for criminal offences. Section 30(1) of the Act on Regulatory Offences (OWiG), allows for the imposition of a fine on legal persons or associations of persons, provided that their leading persons (bodies, board members, representatives, or other managers) have committed a criminal offence or regulatory offence that either violated the association's obligations, led to or was intended to lead to the association's financial benefit. The liability of the legal person can, in principle, be triggered by any type of offence committed by a leading person of the legal person. One such offence is the regulatory offence set out in section 130 OWiG, which addresses the case where non-managerial personnel commit a criminal (or regulatory) offence, resulting from a failure by a leading person to properly discharge his or her supervisory duties (i.e. where proper supervision would have prevented the offence or at least would have made its commission substantially more difficult). In such cases, the leading person may be fined in accordance with section 130 OWiG and the legal person may be held liable in accordance with section 30(2) OWiG.

Under section 30(2) sentence 1 OWiG, the regulatory fine for the legal person may be up to €10 million in the case of an intentional criminal offence of the leading person or up to €5 million in the case of a negligent criminal offence of the leading person. As part of the implementation of the Environmental Criminal Law Directive, Germany plans to raise these maximum amounts to €40 million for intentional offences and €20 million for negligent offences. The maximum amount of the regulatory fine for the legal person in the case of a regulatory offence committed by the leading person is determined under section 30(2) sentences 2 to 4 OWiG.

With regard to the use of Information and Communication Technology (ICT), the INRMTHB is implementing the following measures this year:

- Developing a fact sheet on legal obligations regarding ICT in the context of THB and exploitation, particularly concerning the identification of victims, criminal investigation and prosecution, as well as the obligations of the private digital sector.
- A social media campaign to raise awareness of the role of ICT in THB and exploitation and to highlight the various perspectives on the use of ICT in these fields.
- An interview addressing the use of ICT by traffickers, particularly in recruitment, execution and maintenance of exploitative situations, and drawing attention to existing gaps.

17. Protection of Victims and Witnesses

“Furthermore, GRETA considers that the German authorities should take additional measures to strengthen the protection of victims and witnesses of THB, including by:

- *making full use of the existing measures to protect vulnerable victims and witnesses of THB and to prevent their re-traumatisation and intimidation during the investigation, as well as during and after the court proceedings, including by avoiding the repeated questioning of victims of trafficking and using pre-recorded statements in court;*
- *building the knowledge of all actors in the criminal justice system on how to avoid re-victimisation and stigmatisation of victims of THB through training and awareness-raising, as well as prioritising the rights, needs and interests of victims.”*

To avoid re-traumatisation, victims of THB can take an active role in criminal proceedings as joint plaintiffs in accordance with section 395 StPO. Joint plaintiffs have the right to be present during the trial, to ask questions, to request evidence and to appeal if the defendant is not convicted by the court. To avoid re-

traumatisation and intimidation, they may be assisted or represented by a lawyer in accordance with section 397(2) StPO, who may be assigned to them under the conditions of section 397a(1) StPO without examination of their financial circumstances. During an interrogation, the victim-witness may, if they wish, be accompanied by a person they trust, in accordance with section 406f(2) StPO. Victims of THB are also entitled to the appointment of psychosocial assistance during legal proceedings under the conditions of section 406g(3) StPO in conjunction with section 397a(1) nos. 1 and 5 StPO.

The public may be excluded from the trial where there is reason to fear danger to life, limb or freedom of a witness (section 172 no. 1a GVG), or if circumstances from the private sphere of a party to the proceedings, a witness, or a victim are mentioned, the public discussion of which would violate interests meriting protection (section 171b(1) GVG). The public should be excluded if a witness under 18 years of age is to be examined in proceedings relating to criminal offences of THB (section 171b(2) GVG). The public is to be excluded if the preconditions of subsections (1) or (2) are met and the person whose private sphere is affected applies for such exclusion (section 171b(3) GVG).

Questions concerning the private sphere of a witness may only be posed when they are indispensable for clarifying the case (section 68a(1) StPO).

18. Specialised Authorities and Co-ordinating Bodies

“While welcoming the existence of police officers and prosecutors specialised in dealing with THB in many Länder, GRETA considers that the German authorities should promote further specialisation to deal with THB, including of judges, and provide systematic and periodically updated training to police officers, prosecutors, judges and other relevant professionals which covers the rights of victims of THB and the importance of preventing secondary victimisation.”

In principle, great importance is attached to the training of judges. This also applies to the fight against THB. The German Judicial Academy, a training institution jointly financed by the federal and state governments for the supraregional training of judges and public prosecutors, offers a comprehensive further training programme that also covers THB-related issues. These courses are regularly in high demand, which shows that judges and prosecutors attach great importance to training on these offences. One example is a regular multi-day training course on the topic of “Sexual offences and forced prostitution”.

Furthermore, the Länder, which are generally responsible for the training of judicial officers in state service, organise training events independently.

Judicial staff also regularly participate in events on the phenomenon of THB under the auspices of the Federal Criminal Police Office (BKA). In autumn 2025, for example, a workshop focusing on the use of the Internet took place as part of the EU project “THB LIBERI II – Combating THB and Exploitation to the Detriment of Children, Young People and Adolescents in Germany and Europe”, funded by the Internal Security Fund (ISF), under the leadership of the BKA. The group of about 70 participants included representatives of eight national focal services for combating THB from across Germany, as well as partner services from Switzerland and Austria involved in the project and participants from the justice sector. In terms of content, this multidisciplinary conference focused on investigations into crimes committed using the Internet.

19. Gender-Sensitive Approach to Access to Justice for Victims of THB

“GRETA considers that the German authorities should promote a gender-sensitive approach to access to justice for victims of THB, including through gender mainstreaming and training of relevant officials.”

The Violence Support Services Act (VSSA) provides in section 1(2) no. 3 that the German federal states (Länder) should take measures to promote cooperation of support services specialising in gender-based or domestic violence and the justice system. Women who are victims of THB for sexual exploitation or forced prostitution fall within the scope of the Violence Support Services Act.

As part of the BKA's training programmes, issues related to a gender-sensitive approach to victims of THB are frequently addressed.

20. Training on THB to Staff of the Federal Office for Economic Affairs and Export Control

“Furthermore, GRETA considers that the German authorities should provide training on THB to staff of the Federal Office for Economic Affairs and Export Control, with a view to enabling scrutiny of companies’ performance to prevent THB and labour exploitation.”

The Federal Ministry for Economic Affairs and Energy (BMWE) has instructed BAFA to conduct appropriate training on THB for its staff in 2026.

21. Efforts to Prevent and Combat THB for the Purpose of Labour Exploitation

“GRETA considers that the German authorities should intensify their efforts to prevent and combat THB for the purpose of labour exploitation, taking into account GRETA’s Guidance Note on combating trafficking for labour exploitation and the CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, in particular by:

- ensuring that sufficient staff and resources are made available to FKS to enable it to play a frontline role in the prevention and identification of THB for the purpose of labour exploitation, and in the collection of data on identified victims;*
- ensuring that FKS, the police and other relevant stakeholders increase their capacity to detect and identify victims of THB for the purpose of labour exploitation, paying particular attention to at-risk sectors, such as construction, logistics and agriculture;*
- ensuring that there is a separation in FKS between its inspection role concerning exploitative labour conditions and its other policing tasks, and that FKS inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB;*
- further strengthening the monitoring of recruitment and temporary work agencies;*
- implementing additional measures to prevent abuse of domestic workers, including developing the conditions under which access to private households can be granted for labour inspection;*
- strengthening co-operation between FKS, police, trade unions and other civil society actors, with a view to collecting evidence necessary for successfully investigating and prosecuting cases of THB for the purpose of labour exploitation.”*

The number of FKS officers has risen steadily over the past years, and the FKS has been equipped in line with its responsibilities. During the reporting period, the FKS received additional staff and now has around 9,800 officers.

For the purpose of data analysis and data collection, a comprehensive data package relating to the inspection and investigation activities of the FKS and victim protection was provided to the German Institute for Human Rights (DIMR) again in 2025, based on the cooperation and data use agreement.

The FKS is responsible for fighting undeclared work and unlawful employment on the basis of the Act to Combat Undeclared Work and Unlawful Employment (SchwarzArbG). This includes combating exploitative

working conditions and THB in the context of employment in close cooperation with the supporting bodies specified in section 2(4) SchwarzArbG. FKS officers are sensitised and trained with regard to this legal mandate, including the identification of potential victims (see section 22). Moreover, the FKS has appointed multiple staff members to act as victim protection coordinators. These staff members receive specialist training in interacting with potential victims, including victim detection and identification. The victim protection coordinators are also tasked with establishing a regional network with law enforcement authorities, authorities responsible for foreign nationals and specialised counselling centres, in order to provide quick help for victims.

Through a risk-based approach to its monitoring, inspection and investigative activities, the FKS focuses specifically on vulnerable areas and industries particularly affected by undeclared work and unlawful employment.

The Act for Modernising and Digitalising the Fight against Undeclared Work of 22 December 2025 (*Gesetz zur Modernisierung und Digitalisierung der Schwarzarbeitsbekämpfung –SchwarzArbMoDiG–*; BGBl. 2025 I No. 369) created, among other things, the legal basis for the use of digital and data-supported inspection and investigation methods, as well as an improved data exchange between the FKS and other cooperation authorities. Data can now be systematically analysed for existing risks related to undeclared work and unlawful employment. As a result, inspections can be carried out in a much more targeted way, allowing suspect companies to come to the attention of the investigating authorities more quickly. Due to the holistic inspection approach, every FKS inspection also includes an examination of whether exploitative working conditions exist.

By further strengthening the risk-oriented execution of FKS tasks and the selection of inspection targets, the resources of the FKS can increasingly be deployed to combat structural and organised forms of illegal work, which cause the greatest damages to the state, society and affected employees.

In 2024 and 2025, the FKS once again focused its inspections on labour-intensive sectors, such as construction, hospitality and logistics (see also statistical release available at www.zoll.de).

The existing structures of the FKS provide an effective framework for combating THB for the purpose of labour exploitation and forced labour, as well as for ensuring the associated victim protection. The comprehensive inspection, investigation and sanctioning activities of the FKS ensure that undeclared work and unlawful employment are combated effectively while potential victims of THB for the purpose of labour exploitation and forced labour can be effectively detected. The FKS uses a risk-based approach to target areas that are particularly vulnerable to undeclared work and unlawful employment (see above). Through its decisive actions, it contributes to the enforcement of legal provisions and thereby ensures fair competition and working conditions. In addition, it safeguards social security systems and government revenue and thus strengthens the state's capacity to take effective action. The identification of potential victims of THB, forced labour and labour exploitation is an integral part of the FKS mandate and the responsibility of all its officers. The basic principle of a holistic inspection approach is also maintained in this regard.

To raise awareness among FKS officers of potential victims of THB and labour exploitation, the role of the two victim protection coordinators appointed at each Main Customs Office is currently being adjusted. The important role of victim protection coordinators is being strengthened by officially allocating 50% of their working time to victim protection and this task has now been incorporated into the organisational chart.

In summer 2025, the INRMTHB held discussions with the BMF and the GZD on the FKS mandate and the identification and protection of victims of THB.

In addition to the general day-to-day cooperation between authorities, several measures were taken during the reporting period to strengthen cooperation between the FKS, the police, trade unions and other civil society actors (which are, among others, part of the NAP THB):

The Act Against Unlawful Employment and Social Benefit Fraud of 11 July 2019 expanded the mandate of the FKS to include powers to combat, among other things, THB for the purpose of labour exploitation. Since then, the FKS has specifically examined whether exploitative working conditions exist and has been authorised to conduct investigations in connection with THB for the purpose of labour exploitation and forced labour. In connection with this expansion of its mandate, cooperation between the General Directorate of Customs (GZD – Directorate VII, Financial Control Unit for Undeclared Work/FKS) and the Service Centre against Labour Exploitation, Forced Labour and Human Trafficking, funded by the BMAS, was intensified. To this end, a framework agreement was concluded between the BMAS, the Federal Ministry of Finance (BMF) and the German Trade Union Confederation (DGB) to strengthen cooperation between the FKS and the Service Centre, particularly in the areas of training and awareness-raising for FKS employees at the Main Customs Offices. This agreement entered into force on 1 July 2021. In 2024, the Service Centre, in close cooperation with the General Directorate of Customs and the FKS, developed, in particular, an e-learning tool for the targeted training of FKS employees on the existence and indicators of labour exploitation and forced labour. On the occasion of the fourth anniversary of the signing of the framework agreement, the follow-up event "Fair Working Conditions and Combating Exploitation" was held on 20 November 2025 and served as a forum for exchanging experiences on cooperation.

In August 2024, a cooperation agreement was signed between specialist counselling centres, the Main Customs Office Berlin and the Berlin Police. The agreement aims to combat THB for the purpose of labour exploitation and forced labour through cooperation in prosecution and by strengthening victim protection in all cases.

During the reporting period, work also continued on additional corresponding regional cooperation agreements in the states of Bavaria and Lower Saxony. These regional agreements are intended to further strengthen cooperation at the Länder level in combating labour exploitation. Both agreements are expected to be signed in 2026.

Furthermore, following positive feedback, the pilot project "Joint Project Group on Labour Exploitation" of the Main Customs Office Berlin and the Berlin State Criminal Police Office (LKA) was transformed into a "Joint Investigation Group on Labour Exploitation" in 2025. The corresponding agreement was signed on 23 January 2025. This significantly strengthens cooperation between the FKS and police in Berlin in combating THB.

22. Training on Identification of Victims of THB

“Furthermore, GRETA considers that the German authorities should continue and further strengthen their efforts to proactively identify victims of trafficking by reinforcing the capacity and training of all relevant officials, including at the municipal level.”

The identification of potential victims of THB is regularly an integral part of the training activities carried out by the BKA and the Länder. The BKA organises two training courses per year on combating THB. The topics of these two training activities were:

- “THB for the purpose of labour exploitation through employment, forced labour and labour exploitation”
- “THB for the purpose of sexual exploitation”

The training covered: Phenomenology, current developments and manifestations, modes of operation, case studies, workshops, legal foundations, national and international cooperation, victim protection and other state and non-state support services, intercultural competence in dealing with victims of THB, the Internet and new technologies, as well as post-traumatic stress disorders as a result of sexual exploitation.

The total of 110 participants attended both courses, including civil servants and staff under collective agreements from federal and state police departments and customs, working in the field of THB.

In addition, the BKA provides participants with further information materials, such as guidelines.

In some cases, the BKA also supports training activities of the Länder directly on site through speakers and its own specialist lectures. The BKA also supports the training of the BAMF’s Special Representative for THB.

The Service Centre has developed two e-learning tools: one in 2024, designated for customs authorities and one in 2026 for police officers. The e-learning tool provides a comprehensive overview of relevant information on identification, cooperation partners, as well as claims and rights of the victims.

The Service Centre has also delivered seminars (and is preparing further seminars) to immigration offices and labour protection authorities in different Länder and will continue to offer seminars to these and other authorities.

Since November 2024, more than 5,700 officers of the FKS have successfully completed the online training tool which was designed by the Service Centre in collaboration with the GZD and FKS.

Furthermore, an on-site training session, in cooperation with the Service Centre, was conducted during the reporting period in May 2025 with 25 FKS participants. The training was delivered to newly appointed victim protection coordinators, who had not participated in training in 2022 and 2023. Additionally, three online workshops with 131 FKS participants in total took place in April, May and June 2024.

In October 2024, an exchange of experiences for the victim protection coordinators (two representatives per Main Customs Office) was carried out to amplify and disseminate the knowledge among officers.

Moreover, a meeting with 180 participants organised by the BMAS took place in Berlin in November 2025 under the framework agreement between the BMF, the BMAS and the German Trade Union Confederation (DGB) on cooperation between the FKS, the counselling centres for foreign workers (“Fair Mobility” and “Fair Integration”) and the Service Centre (see section 21).

In addition, the Federal Government has set up a National Focal Point as part of the implementation of EU Directive 2024/1712. From now on, the BKA, together with the KOK e.V., will take over the function of a focal point. To this end, the BKA and the KOK e.V. signed a cooperation agreement on 11 June 2026, which reflects both the cooperation that has existed for many years and the joint task of the ‘focal point’ within the meaning of the EU Directive.

The National Focal Point should serve as a contact point for bodies responsible for the cross-border referral of victims in order to promote victim identification and access to support services for those affected.

With regard to the judicial sector, we refer to our comments regarding the training of judges and prosecutors.

The BMBFSFJ funds ECPAT to organise training on child trafficking for relevant stakeholders (e.g. youth welfare, law enforcement, judiciary, counselling centres, immigration offices and the Federal Office for Migration and Refugees (BAMF)), including at the municipal level.

In 2024, ECPAT Germany facilitated 17 multi-professional workshops, trainings and conferences and held six lectures to a total of 797 stakeholders. In 2025, ECPAT facilitated 14 multi-professional conferences and trainings and held seven lectures to 770 stakeholders, including representatives of youth welfare, municipal authorities, police, the Federal Office for Migration and Refugees, public prosecutors, immigration officials, social workers, childcare services, health-care professionals, counselling centres and teachers on the topic of THB and exploitation of children.

23. Assistance to Victims of THB

“Furthermore, GRETA considers that the German authorities should make additional efforts to ensure that:

- *access to assistance for victims of THB is not made conditional on their willingness to co-operate in the investigation or prosecution;*
- *specialised counselling centres have sufficient human and financial resources to adapt their capacity to demand.”*

Access to assistance for victims of THB is not conditional upon their willingness to cooperate in the investigation or prosecution. However, the right of residence under section 25 (4a) of the Residence Act requires the willingness to testify in court. The current coalition agreement (2025–2029) does not provide for any changes in this respect.

Since January 2026, the KOK e.V. has offered an anonymous and free online point of contact for victims of THB (anlaufstelle-menschenhandel.de). The aim is to enable potential victims of THB to obtain an easily accessible initial assessment and to be referred promptly to suitable support services. This is the first digital, nationwide and specialised service for all (potential) victims of human trafficking that is not limited to specific forms of exploitation or groups of victims.

By providing funds for the development, operation and maintenance of the online point of contact, the BMBFSFJ is implementing a key measure of the NAP THB. This measure responds to the increasing use of digital support and counselling services by (potential) victims of THB and aim to improve access to existing counselling services. In this way, the FBS are expanding their service portfolio to include an additional digital advisory channel. Rather than developing similar digital services in parallel in each federal state, the shared use of IT infrastructure, software and support helps to conserve resources.

As a key measure of the National Action Plan on Preventing and Combating Human Trafficking in Human Beings and Protecting Victims, the BMBFSFJ has commissioned the Violence against Women Helpline to carry out an awareness-raising campaign designed to significantly improve access to the helpline for victims of THB. The campaign “What to do about human trafficking” provides information for victims and their immediate social circle and raises awareness of the helpline’s services in multiple languages. It also raises awareness of the strategies used in THB for the purposes of sexual exploitation and forced prostitution, and thus also serves a preventive function. In 2025, the campaign’s visuals were visible both online and in public spaces and were also disseminated specifically through promotional tours and multipliers. In addition, special training sessions on the topic of THB were held for the helpline’s staff. In 2026, selected aspects of the campaign will be continued – with a particular focus on information regarding the “loverboy” method. An initial evaluation has shown that the number of counselling cases at the helpline classified as cases of THB has already doubled compared to the year before the campaign was launched.

Ensuring Adequate Resources for Specialised Accommodation and Counselling

Within the framework of the Federal-Länder Working Group on THB for the Purpose of Labour Exploitation, the BMAS promotes exchange, cooperation and coordination, inter alia, with regard to accommodation and support for victims of THB for the purpose of labour exploitation. For example, at the working group meeting in September 2025, MEN VIA, an Austrian victim protection institution, was presented as a good practice example. MEN VIA provides support and accommodation for male victims of THB in Austria.

At the upcoming meeting in November 2026, a good practice initiative from North Rhine-Westphalia will present its measures in this area. This will be followed by an exchange on implementation in other regions.

The Violence Support Services Act (VSSA) will ensure a legal entitlement to protection and counselling for women (and their children) affected by gender-based or domestic violence. Women who are victims of THB for sexual exploitation or forced prostitution fall within the scope of the Violence Support Services Act.

Protection and counselling for victims must be low-threshold services and are thus provided without the need for formal identification as a victim of THB for sexual exploitation or forced prostitution. Shelters and counselling services will assess the individual needs of victims based on the victim’s personal account. Assistance under the VSSA is in no way linked to or made conditional on the victim’s willingness to cooperate in any type of investigation or prosecution.

The VSSA will grant shelters and counselling services a legal entitlement to sufficient public funding by 2027, enabling these services to adapt their capacity to demand.

The KOK offers a database indicating the support services of its member organisations. These list a total of 46 safe accommodation offers. The database can be searched here: <https://www.kok-gegen-menschen-handel.de/en/unterstuetzung-finden/fachberatungsstellensuche>

The BMBFSFJ is funding a digital project by KOK e.V. as part of the project “THB 2.0 – Digitalisation, Data Processing and Information Technology Measures to Support Trafficked Persons”. The aim and purpose of the project is the design and implementation of digital solutions, the use of data processing systems and the application of information technology measures to ensure effective support for trafficked persons.

Essential to this are educating and informing the FBS (counselling centres) about the scope and application, research and training on possible courses of action in the field of THB, the role of the Internet and other digital systems and networking with relevant actors. Furthermore, access to trafficked persons and support services are being analysed and expanded in cooperation with member organisations (digital counselling).

The project is also a central measure of the BMBFSFJ for the NAP THB.

24. Residence Permits

“GRETA considers that the German authorities should take further steps to ensure that victims of THB can benefit in practice from the right to obtain a residence permit, including owing to their personal situation, without prejudice to the right to seek and enjoy asylum. The authorities should review the application of the system for granting residence permits to victims of trafficking with a view to ensuring that the victim-centred approach which underpins the Convention is fully applied.”

The current coalition agreement (2025 – 2029) does not include any changes in that regard. No further steps are currently planned.

Part III: Invites

25. The Independent National Rapporteur Mechanism

“GRETA welcomes the appointment of the German Institute of Human Rights as the National Reporting Mechanism and invites the German authorities to take further measures to strengthen the National Reporting Mechanism through the adoption of legislation on its mandate.”

The Independent National Rapporteur Mechanism (INRMTHB) started on 1 November 2022. It is funded by the BMBFSFJ until the end of October 2026.

The main task of the INRMTHB, which is part of the German Institute for Human Rights (DIMR), is to monitor the implementation of the Convention and the EU Directive on preventing and combating THB and protecting its victims, using data- and evidence-based monitoring. The Rapporteur Mechanism works closely with civil society, the government and the public sector and promotes public discourse on THB. Through its published information and findings, it supports the Federal Government with regard to its reporting obligations at national and international level. The work of the National Reporting Mechanism covers all forms of exploitation.

The “Monitoring Report: Human Trafficking in Germany”, first published in October 2024, is the first comprehensive publication of data on victims of THB and the status of implementation of the CoE Convention and the EU Directive, as well as legislation and case law in Germany. An English summary is available at: https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/Publikationen/Weitere_Publikationen/Summary_Monitoring_Report_Human_Trafficking_in_Germany.pdf

The Monitoring Mechanism also closely accompanied the implementation of the amended EU Directive, i.e. through workshops on amendments to the German Criminal Code, as well as by facilitating a national process on developing an NRM.

The INRMTHB is in contact with various actors who, among other things, provide data to the reporting body. It is also in regular contact with national and international actors (EU Commission, GRETA, OSCE, etc.).

The DIMR receives temporary project funding for the reporting mechanism, which will expire in October 2026. The continued operation of the INRMTHB at the DIMR is part of ongoing evaluations.

26. Rights of Refusal to Testify

“Finally, GRETA invites the German authorities to consider codifying a right of refusal to testify for staff of the specialised counselling centres about information received while acting in their official capacity of providing assistance to victims of THB.”

The German Code of Criminal Procedure (StPO) provides for the right to refuse testimony on professional grounds only in narrowly defined exceptional cases (sections 53 and 53a StPO).

With regard to calls for an expansion of the grounds for refusal, it should be noted that only serious circumstances may justify restrictions on the duty to establish the truth as comprehensively as possible, since effective criminal prosecution is part of the rule of law.

27. International Co-operation

“GRETA welcomes the efforts made by Germany in the area of international co-operation against THB, including the participation in JITs and the engagement in EMPACT, and invites the German authorities to continue developing multilateral and bilateral co-operation in combating human trafficking.”

Our authorities are committed to continuing their efforts with regard to international cooperation, in line with the GRETA recommendations.

The BKA participates in various international fora, such as the EMPACT THB Cooperation Framework (European Multidisciplinary Platform Against Criminal Threats) and cooperates in this context both strategically and operationally. Under the current EMPACT cycle 2026 – 2029, in the priority “Trafficking in Human Beings (THB)”, the BKA participates in 13 of the 15 Operational Actions (OAs). In particular, the following OAs, with a management or co-management function of the BKA are intended to contribute, inter alia, to improving the investigation and dismantling of criminal networks operating across borders:

- Fight against THB to the detriment of EU citizens within the EU: The focus is on identifying cross-border criminal networks that recruit, transport and channel their victims within the EU to sexual exploitation and other forms of exploitation. The BKA is a co-leader.
- THB targeting Latin American victims: The OA aims to work with Latin American countries to identify and combat, both within and outside the EU, Organised Crime Groups (OCGs), which focus on THB to the detriment of primarily Latin American victims. For this purpose, Operational Task Forces (OTFs), Joint Investigation Teams (JITs) and action days will be established and implemented, among other things, with the involvement of Latin American partners. The BKA is a co-leader.
- Under the OA led by the BKA, new forms of criminal exploitation such as surrogacy, illegal adoption and forced marriage are to be addressed. Here, too, operational data will be exchanged to detect perpetrator networks.
- Digital dimension of THB: In the future, this OA will increasingly focus on emerging technologies, such as artificial intelligence (AI) in the context of THB. The BKA is a co-leader.

In February 2025, Germany adopted the NAP A/Z (see section 1). One of the three priority areas focuses on the preventive effects of bilateral cooperation with various countries of origin within the framework of migration agreements. Measures to strengthen transnational cooperation at EU level and bilateral cooperation with key countries of origin play a vital role in informing foreign workers in their countries of origin, before they start working in Germany, about their rights and the risks of labour exploitation and forced labour.

As part of a broader bilateral cooperation with Bulgaria in labour and social affairs, a bilateral referral mechanism (BRM) for cases of THB for the purpose of labour exploitation was established. In cooperation with the Bulgarian National Commission for Combating THB (NCCTHB), the BMAS and the Service Centre, funded by

BMAS, developed a practical guide providing an overview of support structures and facilitating communication and case resolution by listing contact points in both countries.

The Federal Foreign Office supported the UN Trust Fund for Victims of Human Trafficking in 2023, 2024 and 2025, The Fund provides legal, humanitarian and financial assistance to victims of THB.

28. Engagement with the Private Sector

“GRETA invites the German authorities to further strengthen engagement with the private sector, in line with the UN Guiding Principles on Business and Human Rights and Council of Europe Committee of Ministers Recommendation CM/Rec(2016)3 on human rights and business and CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, with a view to raising awareness of the role and responsibility of businesses in supporting the rehabilitation and recovery of victims, and facilitation access to remedies.”

The Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) came into force on 1 January 2023. Based on the UN Guiding Principles on Business and Human Rights, the LkSG introduces mandatory human rights due diligence. Further details on the scope of the LkSG and the protected rights have already been provided in the latest GRETA evaluation report. Implementation of the Act is monitored by the BAFA. This agency is equipped with effective enforcement tools to monitor the supply chain management of enterprises. Details are set out in an annual accountability report, which is publicly available on BAFA’s website. On 25 July 2024, the Directive on Corporate Sustainability Due Diligence (CSDDD, Directive 2024/1760) entered into force. Amendments to this Directive resulting from the so-called Omnibus Package (Directive 2026/470) entered into force on 18 March 2026. EU Member States are obliged to transpose the CSDDD into national law by July 2028. The LkSG will be replaced by a law on International Corporate Social Responsibility, which will implement the CSDDD in a manner that reduces administrative burden and supports effective enforcement.

29. Criminalisation of the Use of Services of Victims of THB

“GRETA notes that the use of services from victims of THB for purposes other than sexual exploitation is still not criminalised and invites the German authorities to establish as a criminal offence the use of services of victims of trafficking, with the knowledge that the persons concerned are victims, for forms of exploitation other than sexual exploitation, in accordance with Article 19 of the Convention.”

Reference is made to the previously mentioned draft bills of October 2025 and May 2026 to strengthen the criminal prosecution of THB and sexual exploitation and to implement the new EU Directive. One of the key elements of this draft is the introduction of general criminal liability for the intentional use of services provided by a person who is a victim of THB.



Federal Ministry
for Education, Family Affairs, Senior Citizens,
Women and Youth

Measures Taken by the German Länder in Response to Recommendation CP/Rec(2024)03 on the Implementation of the Council of Europe Convention on Action Against Trafficking in Human Beings

3rd Thematic Evaluation Round

Access to Justice and Effective Remedies for Victims of Traffick-
ing in Human Beings

Berlin, June 2026

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Please note that this report only contains information on developments that have occurred since Germany's responses of January 2023 and the GRETA report of June 2024. Consequently, where no information is provided with regard to a particular recommendation, this should not be interpreted as meaning that no measures have been taken in that area. Rather, it indicates that there have been no new developments to report since the above-mentioned reporting period.

For the list of acronyms please refer to the first part of the report by the Federal Government of Germany.

Part I: Urges

1. Compensation

“While welcoming the recent changes to the legislation on state compensation, GRETA urges the German authorities to make efforts to guarantee effective access to compensation for victims of human trafficking, in line with Article 15 (4) of the Convention, including by:

- enabling all victims of trafficking, irrespective of their residence status, to effectively exercise their right to compensation as a priority in criminal proceedings, or in civil and labour law proceedings;*
- making full use of the legislation on the freezing and forfeiture of assets, as well as international co-operation, to secure compensation to victims of THB (see paragraphs 97 and 102).”*

Bavaria

The training programme, which is available to colleagues from the courts and public prosecutors' offices in Bavaria, also includes the topic of "Victims of Crime and Restitution". The programme is continuously evaluated and further developed as required. For the training programme, see also section 16.

Berlin and Brandenburg

The Joint Legal Examination Office of the states of Berlin and Brandenburg (GJPA) is responsible for the continuing legal education of judges and public prosecutors in Berlin and Brandenburg. As part of this responsibility, a wide range of events in the area of victim protection are offered. The topic of victim compensation is relevant to judicial practice, particularly in connection with victim protection, victims' rights and the appropriate provision of information to victims. In the GJPA's view, a practical focus on the concrete impact on criminal proceedings is particularly useful, rather than an in-depth exploration of specific social law issues. Relevant content is addressed as needed within existing continuing legal education programmes on victim protection.

Lower Saxony

Access to compensation is facilitated by specialised anti-trafficking counselling centres, which inform victims of their rights and assist them throughout legal proceedings. Kobra and SOLWODI provide legal assistance and support victims in asserting their claims, including in criminal proceedings.

With regard to raising awareness of victim compensation, the Lower Saxony Ministry of Justice is currently examining the extent to which this topic can be more fully integrated into training programmes for law enforcement agencies and the judiciary.

Regarding financial compensation, the Victim Assistance Foundation actively provides information on claims under Book XIV of the Social Code (SGB XIV).

The demand that the state provide advance payments in the event of the offender's insolvency is partially met at the state level through the Foundation's provision of material assistance in acute emergencies

North Rhine-Westphalia

Further training on the subject of "Compensation for Victims" has for many years been an integral part of the advanced training programme of the Judicial Academy of North Rhine-Westphalia. The seminars are aimed at judges, public prosecutors, public prosecutors with limited jurisdiction and probation and social services professionals. Detailed information is provided on offender-victim mediation, the perspectives of the parties involved and the potential of section 46a of the German Criminal Code.

Saarland

The Saarland Ministry of Justice regularly organises the conference "Die Gestaltung kindschaftsrechtlicher Verfahren in Fällen elterlicher Partnerschaftsgewalt" (The Design of Family Law Proceedings in Cases of Parental Intimate Partner Violence) (13b/2025). Among other things, the protection of children from sexual exploitation and possible compensation for victims are addressed. Compensation for victims is also the subject of the interministerial symposium "Violence in Close Social Relationships/Domestic Violence – Interdisciplinary High-Risk Management: Identifying, Assessing, Acting".

Saxony

A distinction must be made between compensation for victims under criminal law in accordance with sections 459h et seq. of the German Code of Criminal Procedure (StPO) and compensation for victims of criminal offences under social law in accordance with SGB XIV.

Compensation under social law was discussed in 2024 as part of the annual Social Judges' Day.

Within the framework of state-organised conferences, compensation for victims under criminal law is addressed in part within the conference on criminal asset recovery. Conferences on asset recovery under criminal law are offered for judges, public prosecutors and judicial officers.

The German Judicial Academy organises the following conferences, which also address issues relating to victim compensation:

- "The Main Hearing in Criminal Matters";
- "Sentencing, Victim Protection and Adhesion Proceedings";
- "Asset Recovery under Criminal Law".
- Saxony does not plan any legislative initiatives.

Thuringia

A link to the page on victims' compensation law has been added to the victim assistance page of the Thuringian Ministry of Justice, Migration and Consumer Protection: <https://justiz.thueringen.de/themen/opferhilfeundopferschutz>.

2. Protection of Victims (Use of Audio-Visual Equipment and Other Appropriate Methods)

"GRETA urges the German authorities to ensure that direct confrontation of victims and defendants in THB cases is avoided, to the extent possible, making use of audio-visual equipment and other appropriate methods."

Baden-Württemberg

Audiovisual interviews are used within the framework of the legal provisions to minimise the burden on victims and ensure conclusive documentation for the main proceedings. To make this possible, all criminal police departments in Baden-Württemberg are equipped with an audiovisual interrogation room. This enables interrogations to be conducted in a professional and victim-friendly environment.

To enable victims to testify in court in the absence of the defendant, efforts are being made to equip courts in Baden-Württemberg with stationary and mobile video units. A total of 450 units will be distributed across approximately 800 courtrooms. Of these, 350 units are mobile and 100 units are stationary. The mobile units feature two camera angles and improved usability, making courts particularly well equipped for hybrid video proceedings. In addition, this technology is also suitable for video interrogations, as the second camera was designed specifically for witness examinations. In a pilot project, the Ministry of Justice and Migration is also testing the establishment of child-friendly interrogation rooms at the Karlsruhe Local Court for judicial video interrogations pursuant to section 58a of the Code of Criminal Procedure (StPO). The rooms and technology are designed in such a way that they can also be used for adults, particularly victims of THB. If the pilot project is successfully completed, an expansion to other locations will be considered.

Bavaria

The Bavarian police conduct audiovisual interviews of victims and witnesses in accordance with the applicable legal provisions, including section 58a of the Code of Criminal Procedure (StPO). They maintain the necessary technical equipment for conducting such interviews at their police stations. In criminal main proceedings concerning human trafficking, the public prosecutor's office and the court must always examine whether the examination of witnesses can be replaced by the use of a prior audiovisual interview (section 255a, StPO), whether the defendant can be excluded during the examination of a victim witness (section 247 StPO), or whether an audiovisual examination of the witness during the main hearing from another room or location should be ordered (section 247a StPO). The practice of public prosecutors is further being sensitised in this regard, in particular through the co-operation agreement, which is currently being revised. For the co-operation agreement, see section 8.

Berlin

The introduction of permanently installed audiovisual interrogation technology in the interrogation room of the specialised units responsible for combating human trafficking has not yet been completed. Currently, mobile equipment is being used. The recorded audiovisual interrogations are then transcribed for the investigation file. The planned video interrogation room, which is being financially supported by the BKA's THB Liberi II project, is in the final planning stage and will be equipped once the tendering process has been completed.

Brandenburg

In each police department (PD) throughout the Land of Brandenburg, mobile and stationary audiovisual interrogation technology is available. In addition, child-friendly interrogation rooms have been set up in the vast majority of police stations. In the remaining facilities, where necessary, appropriate child-friendly equipment is provided for existing interrogation rooms, provided that the necessary materials are available for this purpose.

No measures specifically tailored to victim witnesses of THB have been taken in Brandenburg for conducting audiovisual interviews.

In the Land of Brandenburg, however, responsibility for conducting hearings in accordance with section 58a(1) of the Code of Criminal Procedure has been concentrated at the local courts at the seat of the public prosecutor's offices for the respective district court district (Potsdam, Neuruppin, Frankfurt (Oder) and Cottbus), see section 6(1) no. 5 of the Court Jurisdiction Ordinance. This concentration of responsibilities creates better framework conditions for conducting audiovisual hearings. The necessary technology is available at all four local court locations.

If a witness is to be questioned separately from those authorised to be present in accordance with section 168e of the Code of Criminal Procedure or section 247a of the Code of Criminal Procedure, technical solutions are available in the Land of Brandenburg. As part of the “Innovative Courtroom Equipment” sub-project, it is planned that, once construction work has been completed, each court location will be equipped with a modern system for video transmission and recording from the hearing room. During the transitional period, either the existing mobile facilities or facilities at the central locations for proceedings under section 58a of the Code of Criminal Procedure will be used.

Hamburg

Victim protection and a sensitive approach to criminal prosecution are welcomed and are already being implemented through various measures.

If, in addition to THB offences, sexual offences are also the subject of an indictment, specialised chambers at the Hamburg Regional Court with jurisdiction over sexual offences have been responsible for these proceedings since 1 January 2026. This specialisation further improves the judicial handling of sexual offences and ensures that proceedings are conducted more efficiently. This specialised expertise also sends a clear signal to victims of sexual violence, as testifying in court can be extremely stressful in such cases.

Lower Saxony

To prevent secondary victimisation, Lower Saxony has for several years focused on appropriate and legally established interrogation methods and has increasingly made use of audiovisual recordings of victim interviews from the preliminary investigation stage. Such recordings provide a better and more authentic record of the questioning for the purposes of the main hearing, which is particularly in the victim’s interest. Against this background, the existing options for the audiovisual questioning of vulnerable victims and witnesses in pre-trial and criminal proceedings have been further expanded in recent years.

North Rhine-Westphalia

Ensuring effective victim protection in criminal proceedings concerning THB is a top priority. Against this background, the NRW Ministry of Justice attaches particular importance to the implementation of the measures on audiovisual interrogation highlighted in section 3 of the recommendations of the Committee of the Contracting Parties, as well as in section 119 of the GRETA report.

In equipping its organisational units with audiovisual interrogation technology for the protection of victims, the judiciary of North Rhine-Westphalia makes use of the possibilities provided by the Code of Criminal Procedure. The specific equipment of the courts and authorities lies within the responsibility of the respective intermediate authority. These authorities procure the required IT equipment in consultation with the local authorities, taking into account the necessary requirements and structural conditions. The hardware to be procured is generally standardised across the state and is obtained from the product catalogue of the Central IT Procurement Office of the Judiciary (eZIB). The advantage of the standardised product catalogue is, in particular, reduced support effort.

The technical implementation of audiovisual interrogations is usually carried out using mobile systems. These so-called “suitcase solutions” consist of a laptop, a docking station, cameras, a microphone and special recording software. A total of 144 such mobile systems are currently available in the Higher Regional Court districts of Düsseldorf, Hamm and Cologne.

The implementation of audiovisual interrogation equipment is continuously evaluated and further developed. The aim is to ensure criminal proceedings that fully meet both the requirements of the rule of law and the protection needs of victims.

Since 1 January 2024, the number of applications for audiovisual hearings submitted to the court in accordance with section 58a(1) sentence 3 of the Code of Criminal Procedure has been recorded in the statistics on criminal and administrative fine proceedings. If an application requests the audiovisual examination of several persons, such application is recorded separately for each person to be examined. However, it is not recorded how many audiovisual interrogations were actually conducted.

The number of audiovisual hearings conducted by the public prosecutor's offices in accordance with section 58a(1) sentence 3 of the Code of Criminal Procedure is recorded in the public prosecution statistics. These figures have been collected since 1 January 2022, see <https://www.destatis.de/DE/Themen/Staat/Justiz-Rechtspflege/inhalt.html#gu45cgapt>.

Rhineland-Palatinate

In 2022, there were 88 judicial investigative witness examinations recorded on audiovisual media; in 2023, there were 111, and in 2024 approximately 120. The respective offences underlying the proceedings are not known.

The software and hardware for conducting audiovisual hearings in accordance with section 58a and section 247a of the Code of Criminal Procedure is available to all courts in Rhineland-Palatinate.

Saarland

The technical requirements for implementing the provisions under the Code of Criminal Procedure (StPO), in particular sections 55a, 247a and 255a, are fully in place in Saarland. The Saarland Police Directorate has several facilities (both stationary and mobile) for conducting audiovisual interrogations. These are used in investigations in connection with THB whenever appropriate.

Saxony-Anhalt

The technical requirements for audiovisual examinations by judicial authorities have been established in all local courts.

So-called interrogation cases have also been procured for the public prosecutor's offices in Saxony-Anhalt, which can be used by public prosecutors and the police to record interrogations using video technology.

3. Data Collection

“GRETA once again urges the German authorities to set up and maintain a comprehensive and coherent statistical system on THB by compiling reliable statistical data from all main actors, including specialised NGOs, on measures to protect and promote the rights of victims.”

Note: All Länder participated in the INRMTHB data collection efforts.

North Rhine-Westphalia

As part of the data collection by the INRMTHB, a pilot survey was conducted for the years 2023 and 2024 in the five Land-funded girls' shelters for suspected cases of THB. A total of eleven suspected cases were recorded by two girls' shelters during this period and reported back as part of the survey.

4. Identification of Victims of THB

“GRETA once again urges the German authorities to make further efforts to ensure that all victims of trafficking are identified as such and can benefit from the assistance and protection measures contained in the Convention, in particular by:

- *setting up and further developing co-operation agreements in all Länder which cover all forms of THB and follow a multi-agency approach to victim identification;*

- *ensuring that, in practice, the identification of victims of THB, is not linked to the prospects of the investigation and prosecution;*
- *paying increased attention to the identification of victims of trafficking among asylum seekers and migrants, including by recruiting a sufficient number of staff, interpreters and cultural mediators, and providing them with training on THB. In this respect, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;*
- *providing specialised counselling centres involved in the identification of victims of trafficking amongst asylum seekers with sufficient resources to enable them to fulfil this task;*
- *review the application of the Dublin Procedure to presumed victims of THB and conduct risk assessments in order to prevent victims being returned to the country where they first applied for asylum, but where they face the risk of being re trafficked."*

Baden-Württemberg

Criminal police officers in the area of THB have the necessary technical expertise to identify the victim status of contacts or interrogations of potentially affected victims of THB. The indicators underlying police suspicion are based on a case-by-case assessment of the suspicion situation. In addition, in 2025, the state office of criminal investigation in Baden-Württemberg issued a "Recommendations for identifying and combating forced prostitution" for the relevant specialised departments, with intensive attention also being paid to the generation of suspicions and thus the identification of potential victims of THB. Furthermore, the police in Baden-Württemberg do everything possible to support the victims of crime in the best possible way and to avoid secondary victimisation. Follow-up counselling and support for victims are provided by the Baden-Württemberg Police within the according framework of the management and operational order of the Federal Ministry of the Interior, Digitalisation and Local Government. In addition to informing victims about their rights, the aim is to ensure their early and needs-based referral to support and counselling institutions. In each of the thirteen regional police headquarters, a victim protection coordinator is responsible for the implementation and coordination of police victim protection. These coordinators are regionally networked with authorities, counselling services and victim support organisations and ensure the regular exchange of information. The individual organisational units of the protection and criminal police also have multipliers for victim protection matters. They are in regular contact with the regional victim protection coordinators and serve as the direct contact persons for police officers of the respective organisational unit in victim protection matters. Victims of crime are usually informed individually, on a case-by-case basis, of their rights, entitlements and options in criminal proceedings, as well as of their entitlement to compensation, the availability of legal assistance and the options for financial compensation, as soon as they first contact the police. Police officers fulfil this information requirement by, among other things, providing the victim protection card. It contains the essential rights of victims, which the police are required to communicate to injured persons in writing as early as possible. It also contains a Quick Response code (QR code) for the victim protection brochure "Victim Protection Tips and Advice from your Police" of the Ministry of the Interior, Digitalisation and Local Government of Baden-Württemberg, as well as the nationwide leaflet "Rights of Injured Persons in Criminal Proceedings" of the BMJV for victims of a crime, both of which are available digitally in various languages for detailed victim information. All victims who are particularly vulnerable or have an increased need for information (e.g. older people) are provided with this information in line with their needs. The special vulnerability of the victim is assessed at the first contact with the law enforcement authorities in order to counteract additional burdens. The Baden-Württemberg Police assist victims in selecting a suitable counselling centre or assistance facility, which helps victims process their experiences and supports and accompanies the further procedure. In 2015, the Ministry of the Interior, Digitalisation and Local Government of Baden-Württemberg concluded a co-operation agreement with "WEISSER RING" (a victim support organisation in Germany) in order to enable referral to support and counselling institutions as quickly and unbureaucratically

as possible. The aim of the co-operation agreement is in particular to ensure fast and unbureaucratic support for victims of crime. To this end, co-operation between the branch offices of WEISSER RING and the regional police headquarters has been intensified. In addition, the Baden-Württemberg police regularly draw attention to the services of WEISSER RING in their victim protection and prevention materials. After obtaining the consent of the persons concerned, the police may forward their contact details to a suitable support organisation and establish or facilitate contact, including with WEISSER RING.

Bavaria

In order to connect victims of THB to the existing support system, the Bavaria-wide contact point "Bavarian Anti-Trafficking HELPLine" was established in October 2025. The HELPLine serves as the first point of contact, assists with identification and, if necessary, refers individuals to specialised counselling centres. The service is available to victims of all forms of THB and exploitation. Contact can be made by phone (+49 800 9876548), by email, and via a chat function on the specially created website (<https://bavarian-anti-trafficking-help-line.de/en/>). Counselling is provided by specially trained professionals. The service is free of charge, anonymous, multilingual and available regardless of a person's willingness to cooperate with law enforcement authorities. In addition, anonymous reports of suspicion can be submitted via the website.

There is no involvement of the Länder in the identification of victims of THB within the framework of the Dublin procedure. In Germany, the BAMF is solely responsible as the federal authority for the asylum procedure and the implementation of the Dublin III Regulation. It is therefore exclusively the responsibility of the BAMF, which has appropriately trained staff, to identify victims of THB among asylum seekers (in the Dublin procedure) and to decide whether to make use of the right of discretionary self-entry.

Berlin

Presumed victims are identified by the police and referred to specialised counselling centres, irrespective of the prospects of an investigation or prosecution.

The Immigration Office, as the Berlin State Immigration Authority, maintains communication with the police and other authorities, including federal authorities, as well as non-governmental organisations, in order to pursue all available leads concerning suspected cases of THB and to identify victims, in accordance with statutory provisions.

The responsible state authorities work jointly to address such suspected cases. Measures to clarify the facts of a case, as well as case-specific assessments, are initiated immediately when a suspicion arises, in particular by investigative authorities and the Immigration Authority.

Efforts to identify victims of THB, as well as newly affected groups, are supported and coordinated by the relevant Berlin Senate Departments. This is also achieved through cross-departmental committees.

Hamburg

Since 2014, the Koordinierungsstelle gegen Frauenhandel e.V. (KOOFRA), which is funded by Hamburg, has been collaborating with the Servicestelle Arbeitnehmerfreizügigkeit (Arbeit und Leben Hamburg e.V.) to improve the identification of cases of THB for the purpose of labour exploitation and to provide timely assistance for those affected. Since 2018, there has also been a co-operation agreement between KOOFRA and the Hamburg Police to support persons for whom there are indications that they may be victims of THB (section 232 StGB), forced prostitution (section 232a StGB) and/or forced labour (section 232b StGB). In addition to a description of the target groups, it also contains a list of indicators from the "Bundesweiter Koordinierungskreis gegen Menschenhandel e.V.", which can be continuously expanded to include additional indicators.

The introduction of a national referral mechanism at federal level must first be awaited before co-operation agreements can be drafted and further developed.

In Hamburg, the Office for Migration is responsible for deciding on the granting of a residence permit and for assessing or determining the loss or absence of the right to freedom of movement in cases involving victims of THB. Before the responsible immigration authority makes a decision under immigration law regarding a potential residence permit, victims of criminal offences are generally granted a reflection period of at least three months (section 59(7) AufenthG). According to the General Administrative Regulation on the Residence Act (AVwV), number 50.2a.1.2, a plausible statement by the foreign nationals that they are a victim of one of the criminal offences listed in section 25(4a) sentence 1 AufenthG would generally be sufficient for the assessment under immigration law. In any case, it is sufficient if the police or the public prosecutor's office state that they are aware of corresponding concrete indications. In addition to indications provided by the foreign nationals or by a law enforcement authority, indications provided by a specialised counselling centre for victims of THB (e.g. KOOFRA) may also be taken into account.

In addition to the opportunity to speak confidentially with case workers at the Central Initial Reception Centre when submitting an application, there is also the option to contact the social services department of F&W Fördern & Wohnen AöR – the operator of the shelters in Hamburg – at a later stage.

The identification of individuals with special protection needs takes place at the initial reception centre by social services staff who are specially trained professionals and able to recognise signs of special protection needs, even when these are not immediately apparent. The staff are trained to address sensitive issues without pressuring or stigmatising those affected.

The intake interview takes place shortly after admission.

Measures are in place to ensure that meetings with social services, in particular the intake interview, take place in a confidential and secure environment where those involved feel safe to share personal information.

Refugees are informed during the initial interview that the provision of personal information is voluntary and how their personal data will be used. It is emphasised that their privacy and confidentiality will be protected. In addition, access to specific support networks and services is provided.

If there is a suspicion of THB, a report is filed with the police.

Lower Saxony

Identification is carried out through a closely coordinated network of police, government authorities and specialised counselling centres. Of particular importance are the following:

- proactive identification, even when victims are unwilling to disclose information
- focus on vulnerable groups (e.g. migrants)
- ongoing training for relevant stakeholders
- Specialised counselling centres play a central role in the identification process.

North Rhine-Westphalia

North Rhine-Westphalia has increased financial support for full-time equivalents for the eight specialised counselling centres for female victims of THB for the purpose of sexual exploitation from 16.5 to 17 in 2024.

It has also adjusted funding for the eight specialised counselling centres for female victims of THB for the purpose of sexual exploitation with regard to financial resources for interpretation and translation services,

legal assistance by lawyers for foreign victims and accompanying services, in line with price developments throughout the reporting period.

Please also refer to replies under sections 1 and 12.

Rhineland-Palatinate

In the reception centres for asylum seekers in the Land of Rhineland-Palatinate, a central focus is placed on identifying people in need of protection, including victims of THB. A few days after arrival, it is planned that all persons will undergo a detailed interview with specialised psychological staff. The purpose of this interview is the systematic identification of vulnerabilities. Among other things, the interview examines whether the person may have been a victim of THB. In addition to this initial vulnerability assessment, in line with the EU Reception Directive 2024/1346, it is envisaged that protection needs will also be identified at a later stage, for example by the psychosocial service deployed in the centres. Identified needs are generally addressed through various measures, such as referral to suitable counselling and psychological services.

Saarland

In Saarland, there is a cooperation agreement between the public prosecutor's office in Saarbrücken and the Saarland Police Directorate with the NGO ALDONA e.V., which, among other things, provides counselling and support for victims of THB (for the purpose of sexual exploitation) and of pimping. In addition, the Ministry of the Interior and the Saarland Police Directorate are members of the Round Table on THB, where all forms of THB are discussed with the relevant ministries and NGOs. At the Saarland reception centre in Lebach, a well-established and coordinated procedure is applied when admitting new persons, through which special needs, as well as potential indicators of THB, can be identified. This group of persons is also included in the facility's protection against violence concept. For its implementation, not only staff of the authorities but also medical personnel and staff of welfare associations working in the facility are obliged to contribute. With the newly designed admission and screening procedure under the Common European Asylum System (CEAS), the vulnerability assessment, which also covers victims of THB, will be further developed in this context.

Saxony

In the implementation of the Prostitute Protection Act (ProstSchG), the issue of THB plays a role insofar as staff of the competent authorities (public order offices and public health offices) are regularly made aware of this issue through specialised events. However, employees have not yet received intensive training on the topics of THB and forced prostitution. The two independent specialised counselling centres are aware of these issues and take appropriate measures if there is a suspicion of THB or forced prostitution.

A co-operation agreement exists between the police and the KOBRA net counselling centre. KOBRA net supports and advises victims of THB.

The principle of legality cannot be set aside simply because individuals themselves become victims of criminal offences. Decisions based on the principle of prosecutorial discretion (in particular under section 154c of the Code of Criminal Procedure) appear to be sufficient to adequately take into account the victimisation of the persons concerned.

Saxony-Anhalt

The circular issued by the Ministry of the Interior and Sport on 20 August 2021 stipulates that the Police University of Applied Sciences and the State Criminal Police Office (LKA) are tasked with outlining the requirements and principles of co-operation with the VERA specialised centre as part of basic and advanced criminal investigation training. During the reporting period, related services offered by the VERA specialised centre were successfully continued and further developed within the framework of this training. The

specialised centre participated in a total of 24 courses at the University of Applied Sciences. The public prosecutors' offices in Saxony-Anhalt ensure that these specialised cases are handled comprehensively and efficiently by departmental staff who have received appropriate training. Proceedings are dealt with partly by units responsible for combating organised crime and, where labour exploitation is the subject of the proceedings, are regularly assigned to the economic crime divisions due to the related offences that are often involved. The work of public prosecutors specialising in these areas thus ensures the necessary expertise and facilitates the identification of victims of THB as such. Assistance and protection measures tailored to each individual case and coordinated with other parties and organisations ensure the necessary protection of potential victims of THB.

Public prosecutors cooperate with other relevant parties to the extent necessary for the purposes of criminal prosecution.

Standardised procedures for victim identification are in place at the initial reception centre in Saxony-Anhalt. All asylum seekers who are required to reside in the Saxony-Anhalt Central Contact Point for Asylum Seekers (ZAST) – a reception centre within the meaning of section 44 of the Asylum Act – are screened for special protection needs at the time of admission. Protection needs are identified by staff in the social care department, taking into account additional findings, in particular specialist and psychological diagnoses, hospital reports, expert opinions, other evidence or information provided by the person concerned.

If a person is found to be vulnerable within the meaning of the EU Reception Directive (this includes victims of THB) or if there is a suspicion of such vulnerability, the necessary protective measures are initiated. In the reception centre, residents are informed about risks and protection mechanisms with the assistance of language mediators where necessary. Social support services provide referrals to specialised counselling and support centres. Trained staff in the socio-educational, medical and psychological fields are available for this purpose. Reports to the police are made by the persons concerned in consultation with the professional associations, either by the associations themselves or with the support of social care services.

Together with the VERA specialised centre against trafficking in women, forced marriage and so-called honour-related violence, the Ministry of Labour, Social Affairs, Health and Equal Opportunities initiates specialised training courses within the complex counselling context of "Trafficking in Women – Indicators and Interventions in Registration Interviews under the Prostitution Protection Act".

The services provided by the VERA specialised centre, which operates throughout Saxony-Anhalt, address specific needs through highly qualified prevention work, counselling and protection for affected women, some of whom are at particularly high risk. Through specialised conferences and lectures, campaigns, initiatives, as well as the organisation of events and educational programmes, the prevention and education officers raise awareness of the concerns of those affected by trafficking in women, forced marriage and so-called honour-related violence, thereby making an important contribution to improving the social and legal situation. Online training courses in particular have proven especially successful due to their low-threshold accessibility and the resulting broader reach of the programmes. Specific training needs of the authorities are coordinated in the interministerial coordination group of the Land of Saxony-Anhalt. This group includes the Ministry of Labour, Social Affairs, Health and Equality, the Ministry of the Interior and Sport, the Ministry of Justice and Consumer Protection, the Ministry of Education, LIKO (State Coordination Office of Civil Society Actors in the Implementation of the Istanbul Convention) and the Land-funded specialised counselling centre VERA. The main target groups for all online training courses were teachers, school social workers, voluntary equal opportunities officers at schools, migration counselling centres, staff working in child and youth services, pregnancy counselling centres, the police and employees of public offices and authorities. The aim

was to provide the participants with concrete options for action in their respective fields of work. More than 252 people took part in the training courses.

A total of €813,975 is available for the work of the Vera specialised centre in 2026.

In Saxony-Anhalt, the annual state-wide "Dialogue Forum: Lifeworlds and Perspectives in Sex Work" features a diverse programme of activities and further strengthens its networking character. Since 2020, all offices and authorities involved in the implementation of the Prostitute Protection Act (ProstSchG) in Saxony-Anhalt have been invited to participate throughout the state, including:

- The competent authorities of the districts and independent cities (public order and health authorities) in accordance with section 3 ProstSchG-AG LSA,
- the victim protection officers of the police,
- the municipal equal opportunities officers,
- the social service of the judiciary and
- other counselling centres active in the field (specialised counselling centres for sexualised violence, DROBS - integrated counselling centre, etc.).

The Fair Employment Unit of Arbeit und Leben Sachsen-Anhalt gGmbH, funded by the European Social Fund (ESF) and the Land of Saxony-Anhalt, offers training programmes to raise awareness of forced labour and THB for the purpose of labour exploitation among professionals working in counselling services and public administration. These training courses focus on the fundamentals of labour, social and residence law, as well as indicators that may help to identify situations of coercion or labour exploitation.

5. Safe Accommodation

"provide adequate assistance, including safe accommodation, adapted to the specific needs of victims, including male and transgender victims of human trafficking (paragraph 202);"

Berlin

From the perspective of the Berlin Senate Department of Labour responsible for combating THB for the purpose of labour exploitation, Berlin has significantly strengthened its approach. In 2025, a specialised, confidential safe house for victims of labour exploitation and THB for the purpose of labour exploitation was established, providing secure accommodation and comprehensive professional support. This model is the first of its kind nationwide and explicitly improves access to protection, also for male victims.

Berlin provides a protected shelter for adult LGBTIQ+ persons resident in Berlin who are at risk of forced marriage, as well as domestic violence and/or violence committed in the name of so-called "honour." However, the residence requirement may limit accessibility for some victims of THB, who may not have registered residence in Berlin.

Hamburg

For men and LGBTIQ+ persons affected by THB, accommodation in hotels or hostels is generally arranged in Hamburg. Funding for this accommodation is included in the grant provided to KOOFRA; the corresponding operational costs were significantly increased for 2025 in the 2025/2026 biennial budget.

In addition, since 2025, the City of Hamburg has been funding the "Alivio" pilot project, which provides two safe flats for men and non-binary persons affected by domestic violence or forced marriage. In exceptional cases, accommodation may also be provided for victims of THB.

For the 2025/2026 biennial budget, staffing at the KOOFRA counselling centre was increased from 3.8 to 4.2 full-time equivalents, and the budget for housing-related expenses was significantly raised to meet the growing demand for counselling and accommodation.

Mecklenburg-Western Pomerania

The state does not currently have a specialised protection facility for victims of THB. The specialised counselling centre for victims of THB for the purpose of sexual exploitation is expected to provide a protection facility again in 2026, regardless of the gender of the person concerned. Currently, victims of THB for the purpose of sexual exploitation can be admitted to the women's shelters. Admission is only possible for women.

Lower Saxony

Lower Saxony provides safe shelter, currently with 12 subsidised shelter beds. The system is generally intended for anyone in need, regardless of gender. However, the focus has historically been on women (e.g. through SOLWODI), and the expansion of specific services for men and LGBTQI+ persons remains an area for further development.

Rhineland-Palatinate

Target Group: Men

In 2026, the Ministry for Family Affairs, Women, Culture and Integration is, for the first time, also funding an additional counselling centre in Mainz, which specifically supports male victims of sexualised violence. Funding for an additional counselling centre in Trier, which supports men in crisis situations (including those affected by violence), is also planned for this year. The department responsible in the Ministry is advocating for the future establishment of counselling centres for men affected by violence in northern and southern Rhineland-Palatinate in order to cover potential support needs directly within the respective regions.

The need for a shelter for men affected by violence is repeatedly raised with the Ministry by various counselling centres. The responsible department in the Ministry expressly supports this request and is working towards a corresponding pilot project. It should then also be possible to accommodate men (including trans* men) who are affected by THB in one or, if applicable, several such shelters.

Target Group: LGBTQI+

In Rhineland-Palatinate, there are several important contact points for persons affected by queerphobic violence. These are also open to victims of THB. The QUINT* specialised counselling centre in Mainz plays a central role, offering counselling and support to queer people who have experienced violence, as well as to their families. The service is deliberately designed to be low-threshold and includes professional psychosocial counselling, which can be accessed on site, by telephone or online. In addition, incidents can also be reported to the reporting and documentation centre for hate-motivated incidents. This centre documents such incidents in Rhineland-Palatinate with the aim of producing a comprehensive overview of hate-motivated violence in the Land. At the same time, it refers those affected to suitable counselling and support services.

The police also provide dedicated contact points: In addition to a central office, there are numerous regional contact points for queer people. Victims have the opportunity to report queerphobic offences directly to the LGBTI* contact points.

There are no separate accommodation arrangements for victims of queerphobic violence or queer victims of THB. FLINTA* persons in need of accommodation are admitted to women's shelters; however, this applies exclusively to trans* women.

All persons, including queer victims of THB, who are admitted to the Land's initial reception centre take part in an interview with psychological specialists a few days after their arrival. The purpose of this interview is to assess whether there is any vulnerability (see point 4).

Saxony

The specialised counselling centre KOBRA-net is available to all genders. In co-operation with shelters for women and men, there is the option, where necessary, to refer persons to appropriate accommodation. The intervention and coordination centres are also available to all genders.

Expansion in line with the Violence Assistance Act, see section 9.

Saxony-Anhalt

For particularly vulnerable persons within the meaning of the EU Reception Directive, separate residential areas and specific accommodation capacities are available in the reception centre of Saxony-Anhalt in accordance with the 2024 GRETA recommendations for Germany.

The branch facility of the ZAST, the state reception centre (LAE) in Stendal, primarily accommodates vulnerable groups, especially families with children, women travelling alone and other persons with protection needs (including male and trans* victims). There is no separate accommodation specifically for victims of THB in the initial reception centre.

In addition, a further branch facility of the main ZAST office in Halberstadt offers accommodation for particularly vulnerable persons for whom accommodation in the main or branch facilities is unreasonable. In particularly serious cases, the branch facility provides separate accommodation for, among others, seriously ill persons, mentally ill persons, queer refugees (e.g. lesbian, gay, bisexual, trans* and inter* persons), where there are indications of discrimination against them within another residential area of the main or the branch facilities, or politically persecuted persons.

To implement protection against violence measures within the ZAST, staff have been trained and public funding has been provided. Accommodation, as well as social support, medical care and social care services are financed through state funds. This also applies to subsidised return programmes. As part of the social support services, referral counselling is provided to specialised counselling centres and organisations, e.g. to the specialised counselling centre against trafficking in women and forced marriage (VERA).

6. Identification of, and Assistance to, Child Victims of THB

"GRETA urges the German authorities to:

- ensure that relevant stakeholders (police, public prosecutors, immigration officials, social workers, child-care services, health-care professionals and teachers) take a proactive approach and increase their outreach work to identify child victims of THB, paying increased attention to online trafficking and forms of THB other than for sexual exploitation;*
- ensure that child victims of human trafficking, including unaccompanied and separated children, are provided with accommodation which creates a safe and enabling environment for children, paired with enough adequately trained staff, and have access to health care and education;*
- continue to take actions to reduce the risk of unaccompanied and separated children going missing."*

Baden-Württemberg

The Ministry of Social Affairs, Health and Integration, which is responsible for child protection in Baden-Württemberg, is working together with the State Youth Welfare Office to develop a concept for the practice-oriented further development of child protection procedures. The Ministry of Social Affairs, Health and

Integration recognises the need for improved identification of and support for child victims of THB through targeted project funding.

Bavaria

Since November 2022, Bavaria has been funding the project "Together Against Loverboys". This project includes educational workshops in schools and youth facilities, as well as information workshops for professionals in education, youth work and youth care, in order to raise awareness of the loverboy method.

The Bavarian police ensure that victims of THB, especially children, are identified at an early stage, including through the necessary basic and further training, and take the required measures in individual cases to prevent or stop dangers and consistently intervene where there is initial suspicion of criminal offences.

Berlin

Under the leadership of the Senate Department for Education, Youth and Family Affairs, an inter-agency working group has been continuously working since June 2021 on developing a city-wide strategy to strengthen child protection and improve co-operation in combating the trafficking and exploitation of minors, as well as on implementing related measures.

In terms of its structure and measures, the city-wide strategy covers all affected groups (including unaccompanied minor refugees, who, as a particularly vulnerable group, may be at risk), as well as all forms of trafficking in and exploitation of minors.

Since June 2024, the Land of Berlin has been funding the first specialised counselling and coordination centre in Germany (operated by IN VIA), which provides counselling specifically on trafficking in and exploitation of minors. The centre focuses in particular on case-related counselling and support for staff at youth welfare offices and for those working with unaccompanied minor refugees in cases of trafficking and exploitation. The specialised counselling centre supports the identification of victims, risk assessment and evaluation, as well as the development of tailored protection and support measures. Since 2022, the Social Pedagogical Training Institute Berlin-Brandenburg has offered a two-day training course for professionals in child and youth welfare, focusing on the topic of trafficking and exploitation of minors. The Berlin Senate Commissioner for Participation, Integration and Migration provides funding for the Berlin Network for Vulnerable Refugees, which offers counselling to refugees and identifies their needs. The group of refugees who are victims of THB is included and has access to the services of the network.

Berlin Police are closely cooperating with the newly established counselling centre for underage victims of THB, have participated in awareness-raising events with childcare services and initiated outreach meetings with childcare services and residential homes for children and youth in state care.

Police, public prosecutors, immigration officials, social workers, childcare services and healthcare professionals are furthermore represented in a joint working group on THB of minors. The working group has published a guideline on how to proceed in suspected cases of trafficking and exploitation of minors. Based on these guidelines, a corresponding co-operation agreement is to be drafted.

Brandenburg

Brandenburg is committed to improving measures to identify and support child victims of THB. The topic is addressed in the context of continuing education and training courses and the cooperative collaboration between departments and other stakeholders in the field is being advanced. A state co-operation agreement is currently being developed with the involvement of the Ministry of Education, Youth and Sport. Youth welfare offices and the Central Adoption Office Berlin-Brandenburg are also to be included in order to give particular consideration to the concerns of children and young people. Various working groups at both federal and state

level are working on instruments to improve and make more effective the identification of victims of exploitation and THB.

Hamburg

The recommendation is already being implemented by the City of Hamburg. Proactive and outreach work is of great practical importance in Hamburg's youth welfare offices. Hamburg's facilities for children separated from their parents meet high quality standards and are only granted an operating licence once they comply with all regulations.

Lower Saxony

The protection of minors is a key priority for the State Government of Lower Saxony. This protection must be ensured during ongoing preliminary investigations and must continue through the main trial proceedings, which are partly held in public. Efforts to reduce the burden on those affected and to secure statements early on and in a legally sound manner through improved methods of evidence collection and questioning have already been intensified in recent years.

Accordingly, interrogations and other investigative measures involving minor witnesses who are also victims, are conducted with due regard for their special need for protection (section 48a(1) StPO) and in compliance with the prohibition on expediting proceedings (section 48a(2) StPO no. 221 RiStBV). To ensure effective victim protection, Lower Saxony is already making extensive and successful use of the substitute judicial video-interrogation under sections 58a and 255a of the Code of Criminal Procedure (StPO). Reference is also made to the relevant explanations under sections 2 and 15.

Further measures include:

- increased awareness-raising and training for professionals (police, youth welfare services, etc.);
- expansion of early identification, including of new forms such as online exploitation;
- ensuring accommodation, care and access to education and healthcare;
- increased efforts to prevent the disappearance of unaccompanied minors.

North Rhine-Westphalia

Unaccompanied minor refugees in NRW are taken into (temporary) care by the youth welfare offices (municipal level) in accordance with SGB VIII and are provided with care, support and accommodation based on their needs and the best interests of the child. The young people are entitled to all services of SGB VIII. Access to healthcare and education is ensured.

In addition, the Land of North Rhine-Westphalia supports the provision of shelters in youth welfare facilities for girls and young women who are affected by or at risk of forced marriage and/or violence (<https://www.mkjfgfi.nrw/Gewaltpr%C3%A4vention>).

Every school in North Rhine-Westphalia is required to develop a school protection concept against violence and sexual abuse. Within these protection concepts, all members of the school community should be sensitised to the specific situation and dangers for potential underage victims of THB. The development of the concepts has been monitored by the school supervisory authorities since 2025.

The "Guideline on federal co-operation for the protection and support of child victims of THB and exploitation" is not yet available in the training section of the intranet, but is to be included.

Once available, it will be uploaded on the Academy of Justice's training platform and the lecturers will be instructed accordingly on this subject area.

Any financial requirements arising from the recommendation for measures by the Land of North Rhine-Westphalia to combat THB must be assessed within the framework of the applicable budgetary regulations and taking into account the general budgetary situation.

Judicial staff have access to various materials on victim protection. Particular mention should be made here:

- Guidance from the Ministry of the Interior, the Ministry for Children, Youth, Family, Equality, Refugees and Integration, the Ministry of Labour, Health and Social Affairs, the Ministry of Schools and Education and the Ministry of Justice dated 2 October 2023: Co-operation in combating and preventing sexualised violence against children and young people
- Victims' Commissioner of North Rhine-Westphalia: VICTIM PROTECTION AT A GLANCE
- Working aid for victim protection in criminal proceedings
- Federal Government-Länder Working Group "Consistent implementation of section 58a of the Code of Criminal Procedure: Guidelines for the judicial examination of witnesses pursuant to section 58a StPO

Rhineland-Palatinate

The Land has a comprehensive and nationwide child protection system that provides effective support to children and young people affected by any form of violence.

As part of the general strengthening of child protection, Rhineland-Palatinate adopted the "Pact against Sexualised Violence against Children and Adolescents" in 2023, which provides for measures on prevention, awareness-raising and improvement of support systems. A commission submitted recommendations to the Land government in 2024. A council of victims acts as an independent representative body. In May 2026, an independent Land Commissioner against Sexualised Violence against Children and Adolescents was appointed for the first time, in order to implement a key recommendation for action. These measures indirectly contribute to the implementation of GRETA recommendations in the field of child protection, but are not specifically targeted at THB.

In the area of intercountry adoption, Germany already has differentiated and closely monitored protective mechanisms in place to prevent child trafficking and improper adoption practices. The Central Adoption Agencies of the Länder and the recognised intercountry adoption agencies run by independent organisations act on the basis of clear legal provisions (in particular the Adoption Placement Act – AdVermiG) and are subject to state supervision. Placements are generally carried out exclusively through authorised agencies and, in the case of independent intercountry adoption agencies, only in co-operation with approved countries of origin.

Saarland

The experience of the authorities in Saarland shows that youth welfare offices, the former clearing centre for unaccompanied minor foreign nationals, or other institutions involved in processes concerning children and adolescents repeatedly make low-threshold notifications and reports to the Saarland Police Headquarters when there are indications of exploitation or THB. This indicates that the relevant bodies deal with the issue sensitively and attentively.

Please also see answers to section 19.

Saxony-Anhalt

Combating THB requires a multidisciplinary approach. In this respect, the Ministry of the Interior and Sport, in agreement with the Ministry of Justice and Consumer Protection and the Ministry of Labour, Social Affairs, Health and Equality, revised a Joint Circular "Measures against Human Trafficking and Forced Prostitution"

(dated 20 August 2021) and circulated it to the Land Administration Office and the police authorities for compliance. The provisions contained therein regulate the co-operation of the authorities involved (including the police, immigration authorities, youth welfare office and family courts) and the measures to be initiated by them, as well as the co-operation with the specialised centre against THB and forced marriage (VERA). In addition, general prevention and support structures exist within the school system.

The VERA specialised centre advises and supports minor victims of THB for the purpose of sexual exploitation. In all (few) cases in recent years, staff at the VERA specialised centre – where this had not already been done by co-operation partners – immediately contacted the competent youth welfare office upon becoming aware of a case. In co-operation with the responsible staff, suitable accommodation is arranged, usually in residential child and youth welfare facilities. Further counselling and support are provided in co-operation with the staff of these residential facilities. Where the accommodation was outside Saxony-Anhalt, the responsible local authorities and counselling centres were informed.

Thuringia

The measures and services established in Thuringia for the protection of children and young people apply to all children affected or threatened by violence. These young people can contact child protection services. Child protection services offer easily accessible counselling aimed at ending all forms of harm to children and young people. This counselling service is available in almost all districts and independent cities in Thuringia. The counselling does not specifically address the risks of THB. However, THB is a form of child endangerment for which counselling should be provided. Professionals are to receive training to identify THB as an indicator of child endangerment.

In addition, child and youth welfare services under Book VIII of the German Social Code (SGB VIII) provide services and carry out other functions that offer accommodation, maintenance and medical care to children affected or threatened by violence, as well as to children without legal guardians (sections 27 ff., 39 and 40 SGB VIII). These regulations are being implemented in Thuringia. The implementation of these regulations will also require training for professionals to help identify children affected by THB and to address their specific circumstances when providing care.

7. Recovery and Reflection Period

“GRETA once again urges the German authorities to ensure, in compliance with the obligations under Article 13 of the Convention, that all possible foreign victims of trafficking, including those falling under the Dublin Regulations, are offered a recovery and reflection period and are able to fully benefit from all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period.”

Baden-Württemberg

The Baden-Württemberg Co-operation Guideline sets out provisions on the recovery and reflection period for victims of THB for the purpose of sexual exploitation.

Bavaria

As soon as the immigration authorities have concrete indications that a person has been a victim of one of the criminal offences (THB) referred to in section 25(4a) of the Residence Act, the minimum three-month recovery and reflection period provided for in section 59(7) sentence 1 of the Residence Act is granted.

Berlin

Affected individuals, victim support centres and, in some instances, even public authorities are increasingly expressing criticism of the federal statutory provision in section 59(7) of the Residence Act (AufenthG). The criticism centres on the argument that the recovery and reflection period constitutes merely an extended

deadline for departure, rather than a *Duldung* (temporary suspension of deportation) or a temporary residence permit granted as a matter of right. According to accounts from affected persons and their advocacy groups, this situation occasionally results in restrictions or difficulties in accessing and making use of available assistance and support measures. The Berlin Police states that it furthermore limits victims' trust in state institutions and reduces their willingness to testify.

Consequently, the recommendation set out in point 34 of the GRETA Report (section 221) which calls for a review of the residence law framework governing the treatment of victims of THB in order to ensure the full and unreserved implementation of the Convention's underlying victim-centred approach, should also be applied to the legal design of the recovery and reflection period. Responsibility for taking action in this regard lies with the Federal Government and the federal legislature.

Hamburg

In July 2025, an exchange took place between KOOFRA e.V., the Ministry of the Interior and Sport, the Social Welfare Authority and the Hamburg Job Centre concerning entitlement to benefits under SGB II for victims of THB. As a result, a procedural description was developed for EU citizens who are victims of criminal offences under sections 232 to 233a of the German Criminal Code (StGB), under section 10(1) or section 11(1) no. 3 of the Act to Combat Illegal Employment (SchwarzArbG), or under section 15a of the Temporary Employment Act (AÜG). This process description regulates the further procedure for processing applications for benefits under SGB II submitted by EU citizens who are victims of such criminal offences. This made it possible in Hamburg to close the gap in provision that previously existed in practice for this group between the date of the decision to testify in court and the actual issuance of a residence permit under section 25(4a) of the Residence Act (AufenthG).

Lower Saxony

Access to support services in Lower Saxony is not contingent on participation in criminal proceedings. This ensures that those affected are given time to stabilise, reflect and can access support services (such as housing and psychosocial care), regardless of decisions concerning their residency status or the proceedings.

Rhineland-Palatinate

A co-operation concept is in place in Rhineland-Palatinate. It contains a "Guide to Residence Law Issues (Victims of THB) - Residence Act (AufenthG)" and explains the residence law provisions relating to victims of THB. The concept is available to all immigration authorities, who were most recently informed in 2024, by means of a comprehensive decree on the implementation of termination of residence, of the provisions under section 59(7) of the Residence Act (AufenthG). In recent years, no cases are known in which local immigration authorities have reported shortcomings in their handling of this group of persons.

Saxony-Anhalt

According to the Joint Circular "Measures against Human Trafficking and Forced Prostitution" (dated 20 August 2021), the VERA specialised centre against trafficking in women, forced marriage and so-called honour-related violence should be involved at the earliest possible stage. The main tasks of the VERA specialised centre include, among others, psychosocial counselling and support for female victims up to the court proceedings, assistance in dealings with public authorities and preparation for return to their country of origin. In addition, female victims of THB are to receive qualified support for the duration of their stay in Germany – regardless of their willingness to testify. In this respect, the VERA specialised centre also fulfils the requirement under section 59(7) sentence 4 of the Residence Act (AufenthG) of informing female victims of THB who approach the specialised counselling centre about the applicable regulations, programmes and measures.

Part II: Considers

8. Co-operation Agreements

“Stressing the obligation in Article 29(2) of the Convention to ensure co-ordination of policies and actions against THB, GRETA considers that the German federal and Länder authorities should take steps to ensure that all Länder have co-operation agreements on combating THB which involve all relevant stakeholders, address all forms of THB, and identify and assist victims of trafficking without discrimination. The aim should be to ensure greater coherence and effectiveness of the actions of all stakeholders across Germany in combating and preventing THB in all its forms.”

Bavaria

A co-operation agreement (<https://www.gesetze-bayern.de/Content/Document/BayVwV96522/true>) has been in place in Bavaria since 2004. It is currently being updated with the involvement of additional stakeholders and extended to cover all forms of exploitation. The aim is to further improve co-operation between specialised counselling centres, the police, the judiciary, immigration authorities and other relevant agencies, and to increase confidence in dealing with victims of THB.

Berlin

Since August 2024, there have therefore been two additional separate co-operation agreements, each with its own specific focus and participants:

- A co-operation agreement between the Berlin Police and Berlin counselling centres and facilities for victims of THB for the purpose of sexual exploitation;
- A co-operation agreement between the Berlin Police, the Berlin Main Customs Office and Berlin counselling centres and facilities for victims of THB for the purpose of labour exploitation.

In light of the update to the co-operation agreements and the revision of the EU Directive on THB, the Senate Department for Labour, Social Affairs, Gender Equality, Integration, Diversity and Anti-Discrimination established an Expert Commission on THB in 2025, under the leadership of the Labour and Gender Equality Divisions. The aim of this body is to identify synergies among the participating stakeholders (government agencies, law enforcement authorities, police, customs, and NGOs) and leverage them strategically in order to combat THB more effectively.

Brandenburg

Various departments of the Land of Brandenburg are currently working on the development of a co-operation agreement covering the areas of THB, forced labour and labour exploitation. In addition, efforts are being made to strengthen networking at regional level among stakeholders in the field of THB.

Lower Saxony

In Lower Saxony, there is close and institutionalised co-operation between the police, the public prosecutor's office, immigration and social welfare authorities, youth welfare offices, employment agencies, job centres and specialised counselling centres, as well as – within the scope of their respective responsibilities under the Prostitution Act (ProstSchG) – trade and public order authorities and lower-level health authorities. This co-operation is governed by the Joint Circular "Co-operation for the Protection of Victims of Human Trafficking for the Purpose of Sexual Exploitation and Forced Prostitution" (Joint Circular of the Ministry of the Interior, the Ministry of State, and the Ministry of Justice dated 16 July 2020 – 23.2-12334/15-4). The participants include the Lower Saxony Ministry of the Interior, Sport and Digitalisation, the Lower Saxony Ministry of Justice and the Lower Saxony Ministry of Social Affairs, Labour, Health and Equality.

The circular defines clear responsibilities, co-operation structures and procedural workflows and ensures an inter-agency, victim-centred approach.

The specialised counselling centres are firmly integrated into these co-operation structures and make a significant contribution to networking between governmental and non-governmental actors.

Saxony

In accordance with Objective 74 of the Land Action Plan for the Implementation of the Istanbul Convention in Saxony (LAP IK), THB for the purpose of sexual exploitation and forced prostitution are actively and effectively combated as forms of gender-specific violence, particularly against women. To this end, a technical exchange with all relevant stakeholders at Land level was established in 2024. If necessary, the participants agree on new coordination structures or the development of new forms of co-operation.

Schleswig-Holstein

A co-operation agreement is currently being developed in Schleswig-Holstein.

9. Right to Information

“GRETA considers that the German authorities should continue to make efforts to ensure that all presumed victims of trafficking, including children and those detected among asylum seekers and migrants, are proactively informed of their rights, including the right to a recovery and reflection period, the available support services and how to receive them, and the consequences of them being recognised as victims of trafficking, taking into account victims’ age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disabilities which may affect their ability to understand the information provided.”

Baden-Württemberg

Baden-Württemberg is funding three recognised specialised counselling centres for victims of THB for the purpose of sexual exploitation, which implement needs-based projects for information and awareness-raising.

In Baden-Württemberg, there are several specialised counselling centres that provide advice to workers from EU and non-EU countries on labour and social law issues or support them in cases of labour exploitation. In Baden-Württemberg, four counselling services have been funded since 2025.

Bavaria

The Bavarian Police fully comply with their statutory duties of information and clarification in accordance with the relevant provisions, in particular the Code of Criminal Procedure (StPO). They inform presumed victims of THB about their rights. This information is provided in a way that is appropriate to the target group and easy to understand, in order to ensure the effective exercise of victims’ rights in criminal proceedings.

Berlin

If affected persons at the arrival centre for asylum seekers at the State Office for Refugee Affairs and Accommodation in Berlin indicate or state that they are victims of THB, the State Office refers them to specialised counselling centres or schedules an appointment. In individual cases, further steps are coordinated in consultation with the counselling centres. In most cases, the arrival centre setting – and thus the time of arrival – is not yet the appropriate moment for individuals to disclose their situation. However, efforts are made to refer individuals who appear to be under significant distress – and where there is a suspicion of exploitation or THB – to initial psychological counselling or other specialised counselling centres, and, if necessary, to provide appropriate accommodation (e.g. in a women’s shelter). In general, asylum seekers are advised that it may be important to raise the issue of potentially being a victim of THB during the asylum process and, if necessary, to report it to the authorities. Berlin Police inform presumed victims of their rights, as required, and refer victims to specialised counselling centres (including a specialised counselling centre for underage

victims), in accordance with the above-mentioned co-operation agreements, from the outset of investigations. Co-operation between the police and specialised counselling centres ensures that presumed victims of trafficking are informed of their rights and receive all available support.

Brandenburg

The Land of Brandenburg funds a counselling centre for women affected by THB to implement these tasks.

Mecklenburg-Western Pomerania

Within the remit of Mecklenburg-Western Pomerania, the Equal Opportunities Ministry is responsible for implementing this recommendation, in particular by funding the work of a specialised counselling centre for victims of THB for the purpose of sexual exploitation. Through its activities, in particular awareness-raising and training measures, this centre contributes to the early identification of potential victims and to ensuring that they are informed of their rights. The stakeholders addressed include the police, pregnancy and migration counselling services, refugee support facilities and child and youth welfare professionals.

Lower Saxony

In Lower Saxony, victims of THB are proactively informed about their rights and the support services available to them. Specialised counselling centres play a central role in this effort and regularly organise information events, training sessions and public awareness campaigns. These initiatives are aimed at potential victims, professionals and the general public and are designed to raise awareness of the various forms of THB.

In addition, the Lower Saxony Victim Assistance Foundation, with its eleven victim assistance offices, is available to all victims of crime in Lower Saxony. Where necessary, victims are referred from there to specialised support services.

North Rhine-Westphalia

Ministry of Labour, Health and Social Affairs of North Rhine-Westphalia (NRW):

The Ministry of Labour, Health and Social Affairs of North Rhine-Westphalia (NRW) supports a network of specialised counselling centres for workers in precarious or exploitative working conditions. These counselling centres provide comprehensive information on social and labour rights and support individuals in enforcing them.

The network includes 53 “Beratungsstellen Arbeit” (BSA), which serve as low-threshold contact points across the state, as well as a legal advice office and the “Beratungszentrum gegen Arbeitsausbeutung und Menschenhandel NRW (BEAM)” (Arbeit und Leben NRW).

All staff have been trained to identify victims of labour exploitation and THB.

While victims can receive initial counselling at any counselling centre that is part of the network, the BEAM project is specifically dedicated to victims of trafficking for the purpose of labour exploitation. BEAM offers tailored support, including an initial assessment to clarify the individual's situation and information on legal rights.

The network ensures a seamless referral process to BEAM for all identified victims. These services are co-funded by the European Social Fund (ESF) and the Land of North Rhine-Westphalia.

From 2024 to 2026, North Rhine-Westphalia has funded a special awareness-raising and training programme initiated, developed and implemented by the eight Land-funded specialised counselling centres for female victims of THB for the purpose of sexual exploitation. The programme was designed to inform groups of girls in schools or other institutions, as well as professionals working with juveniles and young adults, about THB

for the purpose of sexual exploitation through the "loverboy" method and to increase the number of identified victims.

Saxony

The specialised counselling centre for victims of THB and those affected by so-called honour-related violence (KOBRAnet) was set up at two different locations under this catalogue of measures and has been funded to date under the directive on the promotion of equal opportunities in the SMS. KOBRAnet is very well networked with various actors in the field of THB, including women's and child protection facilities, men's protection facilities, intervention and coordination centres, health authorities, police, migration advice centres, initial reception centres and shared accommodation for refugees, the BAMF, immigration authorities, job centres, social welfare offices and the Federal Employment Agency. In addition, the police and the specialised counselling centre KOBRAnet inform victims about their rights.

As part of the implementation of the Violence Assistance Act, the Free State of Saxony plans to run the KOBRAnet specialised counselling centre as an institution in accordance with section 6 GewHG and thus provide it with better financial and personnel resources. This should enable the opening of a third location in Chemnitz and the expansion of family protection places in the future. This is intended to ensure that the Länder fulfil their mandate to provide protection and counselling services.

Schleswig-Holstein

In Schleswig-Holstein, the specialised counselling centre contra, which is funded by the Land, is responsible for informing and supporting victims of THB. Funding for the specialised counselling centre is increased annually. Since 2026, funding is also available for shelter accommodation.

Thuringia

A link to [bekom thüringen](#) – a specialised and independent counselling centre for victims of THB and third parties in Thuringia that provides multilingual information – has been added to the victim support page of the Thuringian Ministry of Justice, Migration and Consumer Protection.

10. Qualified Interpreters

"GRETA also considers that the German authorities should take measures to increase the number of qualified interpreters who are sensitised to the issue of human trafficking and the vulnerabilities of victims, and to ensure their timely availability."

Bavaria

The Bavarian police have interpreters for various languages and voice messages available throughout the Land. They not only have the necessary professional qualifications, but also the necessary knowledge of the principles of the investigation procedure, including the role and rights of injured parties.

Berlin

The Berlin Senate Department for Gender Equality supports grant-funded specialised counselling centres (Ban Ying e.V., IN VIA Berlin e.V., Solwodi Berlin, Hydra e.V., Zentrum für sexuelle Gesundheit und Familienplanung Charlottenburg-Wilmersdorf) by funding language mediation and interpretation services.

From the perspective of the Berlin Senate Department of Labour, responsible for combating THB for the purpose of labour exploitation, Berlin relies on qualified interpreters from existing interpreter pools and specialised counselling centres (Berliner Beratungszentrum für Migration und Gute Arbeit - BEMA Berlin). Further expansion of the pool of trained interpreters who are sensitised to THB is supported in order to ensure their timely availability.

In addition, a state programme for audio and video interpreting (AVD) is in place. This additional tool enables public administration staff to improve communication with non-German-speaking residents of Berlin.

The Land of Berlin is proactively implementing the "Servicestelle" project, under which persons affected by THB are proactively offered support services, regardless of nationality, age or other factors. The assistance provided is needs-based and is delivered, among others, through the following specialised counselling centres: Solwodi, BEMA and IN VIA etc.

Berlin Police have not conducted any training or awareness-raising events for interpreters on the issue of THB. Whenever possible, interpreters are assigned who have already worked extensively in this field and thus possess considerable experience in THB offences.

The very limited number of interpreters for Romani and the various languages spoken in Africa and India remains a challenge.

Brandenburg

The Land of Brandenburg provides an interpreting tool that can be accessed by authorities throughout the Land.

Lower Saxony

The "Words Help Women" programme contributes to this effort by providing linguistically and culturally sensitive support to women who are particularly vulnerable and by facilitating their access to counselling, protection and support services. The project has been in operation since 2016 and focuses on language mediation for refugee women who arrived in Germany after 1 January 2015. It specifically addresses matters covered by section 218 f SchKG, violence against women and girls and victims of THB for the purpose of sexual exploitation.

North Rhine-Westphalia

In 2024, funding for the eight specialised counselling centres for female victims of THB for the purpose of sexual exploitation was slightly increased to take account of general price increases for interpreting and translation services.

Saxony

The public order and health authorities responsible for implementing the ProstSchG regularly engage interpreters in cases where language barriers cannot be overcome. No information is available as to whether these interpreters have received specific training or have been sensitised to the issue of THB. In most cases, professional interpreting service providers are commissioned, and it can be assumed that they do not possess qualifications relating specifically to this subject area. The same applies to the use of interpreters at the specialised counselling centres. Under the Equal Opportunities Directive, the KOBRA-net counselling centre and all other counselling and protection centres also receive funding for translation services. As part of the implementation of the Violence Protection Act (GewHG), the resources available for translation services are to be improved.

11. Legal Assistance and Free Legal Aid

"GRETA considers that the German authorities should make additional efforts to guarantee access to justice for victims of trafficking, in particular by ensuring that:

- *legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of human trafficking, before the person concerned has to decide whether or not he/she wants to co-operate with the authorities and/or make an official statement;*

- *access to free legal aid for adult victims of labour exploitation under section 233 of the CC does not depend on proof of lack of financial means to pay for a lawyer.*
- *victims of trafficking have effective access to free legal assistance in related fields, such as civil, labour and immigration law; - sufficient funding is provided for legal assistance to victims of trafficking;*
- *sufficient funding is provided for legal assistance to victims of trafficking;*
- *Bar Associations are encouraged to offer specialised training to lawyers assisting and representing victims of trafficking.”*

Baden-Württemberg

Specialised attorneys must engage in continuing education under section 15 of the Specialised Attorneys Act (FAO). Such continuing education courses are offered by bar associations, although the range of providers is very broad and there is no monopoly by specific organisers. Thus, there is a market of commercial providers and professional organisations such as the German Lawyers' Institute (Deutsches Anwaltsinstitut e.V.) also offer relevant continuing education courses. In the area of specialised legal practice only, proof must be submitted to the bar associations (section 15(5) sentence 1 FAO). As the legal supervisory authority (section 62(2) BRAO), the Land Justice Administration has no influence over the continuing education provision. However, such encouragement does not raise any professional concerns.

Berlin

The specialised counselling centres supported by the Senate Administration for Gender Equality offer legal advice.

The Berlin Senate Commissioner for Participation, Integration and Migration provides legal and social counselling through the Berlin Welcome Centre. The centre offers free legal advice on issues related to THB, such as migration law and labour law, as well as access to social rights and social assistance. Victims are supported according to their needs. In addition, the Commissioner provides funding for NGOs that offer free legal aid to refugees and migrants in connection with asylum law and migration law.

From the perspective of the Berlin Senate Department of Labour responsible for combating THB for the purpose of labour exploitation, early access to legal counselling in Berlin is ensured through specialised counselling centres.

Lower Saxony

In Lower Saxony, the Victim Protection Unit has improved access to information through the multilingual online portal "Victim Protection Lower Saxony", which provides victims of THB with easily accessible information about their rights and entitlement to legal assistance. In addition, the Lower Saxony Victim Assistance Foundation offers free counselling on initiating civil proceedings through its eleven victim assistance offices, which can be accessed regardless of whether the victim is willing to testify. While legal assistance is generally provided through statutory legal aid for litigation and counselling costs, the Foundation complements this with emergency financial assistance in cases of hardship, thereby effectively mitigating barriers in access to justice.

North Rhine-Westphalia

Any financial requirements arising from recommendations for measures by the Land of North Rhine-Westphalia to combat THB must be assessed in accordance with the applicable budgetary provisions and taking into account the general budgetary situation.

Insofar as GRETA suggests greater specialisation of further training courses for lawyers, it should be pointed out that the bar associations, as public corporations, are responsible for deciding on such courses. There is

no direct control by the State Justice Administration in this respect. However, GRETA's recommendation will be taken up at the next service meeting with the management of the bar associations.

The project "Beratungszentrum gegen Arbeitsausbeutung und Menschenhandel NRW" (BEAM) (Arbeit und Leben NRW) provides specialised support for victims of trafficking for labour exploitation. This includes providing comprehensive information on their labour and social rights and assisting them in enforcing those rights, thereby significantly improving access to justice. Furthermore, the project maintains close co-operation with law enforcement and monitoring authorities, such as the police, the Financial Control of Undeclared Work Unit (FKS) of the customs administration and the North Rhine-Westphalia Occupational Health and Safety Authorities.

The legal advice centre "Effectiveness through Outreach - Legal Advice Centre with Professional Legal Expertise in the Network against Labour Exploitation" provides professional legal advice by a lawyer on labour law and, where necessary, legal support in enforcing rights (excluding representation in court). In addition, advisers in the network of counselling centres for workers in precarious or exploitative working conditions in North Rhine-Westphalia receive specialised training in labour law and ongoing support from the centre.

The projects are co-funded by the European Social Fund (ESF) and the Land of North Rhine-Westphalia.

During the reporting period, funding for the eight specialised counselling centres for female victims of THB for the purpose of sexual exploitation was adjusted to reflect financial resources for legal aid provided by lawyers for foreign victims, in line with price increases.

Schleswig-Holstein

In Schleswig-Holstein, there is a Central Contact Point for Victims of Crime and their Relatives, which aims to refer victims of crime quickly and unbureaucratically to suitable support services.

Thuringia

The counselling centre for sex workers in Thuringia suggests that people without legal residence status are usually very afraid to take legal action, report incidents, or contact public authorities. It might be useful if people were guaranteed secure residence status or were not subject to adverse consequences based on their residence status or similar factors.

12. Psychological Assistance

"GRETA considers that the German authorities should guarantee timely access of victims of trafficking to psychological assistance, including by providing sufficient funding for the specialised counselling centres, and ensure that it is provided for as long as their individual situation requires, in order to help them overcome the trauma they have been through and achieve a sustained recovery and social inclusion."

Baden-Württemberg

The three specialised counselling centres for victims of THB for the purpose of sexual exploitation provide psychosocial support as part of their counselling services. In addition, the Ministry of Social Affairs funds a project for initial therapeutic care for victims of THB for the purpose of sexual exploitation – a project for the psychological stabilisation and support of individuals registered with the specialised counselling centre FreiJa in Freiburg.

The project provides direct access to initial therapeutic care for clients of the specialised counselling centre FreiJa in Freiburg who have been affected by THB for the purpose of sexual exploitation.

Waiting times for therapy slots are long – sometimes exceeding nine months – which can lead to crisis situations and a lasting deterioration in mental health.

The project is thus intended to provide short-term therapy to bridge waiting periods and ensure initial therapeutic care. This is particularly important for individuals from so-called third countries, who rely on interpreters and face difficulties accessing therapy services. The project aims to strengthen co-operation with existing care centres in Freiburg in order to provide comprehensive support. Website: <https://www.diakonie-freiburg.de/angebote/frauen/freija/therapeutische-erstversorgung/>.

Bavaria

The Free State of Bavaria has been supporting the specialised counselling centres Jadwiga and SOLWODI Bayern for many years. These provide victims of THB with advice, protection and support. Their services are holistic, multilingual, free of charge and anonymous on request. The specialised counselling centres offer, among other things, psychosocial counselling and support to help stabilise the victims, facilitate a return to a normalised daily life and assist in developing new perspectives.

The updating of the co-operation agreement is intended to further improve co-operation between the authorities and specialised counselling centres.

Berlin

The specialised counselling centres funded by the Senate Office for Gender Equality provide psychological support and ensure that such support continues as needed to help those affected process their trauma and achieve long-term recovery and social reintegration.

From the perspective of the Berlin Senate Department of Labour responsible for combating THB for the purpose of labour exploitation, specialised counselling centres provide or refer to psychological support. Efforts are made to secure sustainable funding and ensure long-term access based on individual needs, within the limits of available budgetary resources.

The Berlin State Office for Refugee Affairs and Housing is responsible for providing services to meet the medical needs of this group of individuals. This is done through registration with one of the five participating health insurance companies, which are bound by a framework agreement with the Land of Berlin (section 264(1) of Book V of the Social Code). Their list of covered services includes the costs for psychological treatment. Measures are taken to refer individuals who appear to be under significant distress – and where there is a suspicion of exploitation or THB – to initial psychological counselling or other specialised counselling centres. The City of Berlin also provides funding for two psychosocial centres for refugees and torture victims that are sensitive to the matter of THB and treat victims according to their capacities.

Mecklenburg-Western Pomerania

Psychosocial support for victims of THB for the purpose of sexual exploitation is being strengthened in Mecklenburg-Western Pomerania by funding a specialised counselling centre. The budget allocated for this purpose has been gradually increased in recent years in order to expand staffing capacities. While funds were available for one full-time position in 2024, two full-time equivalents could already be financed in 2025; a further increase to 2.75 positions is planned for 2026.

Lower Saxony

Lower Saxony takes a comprehensive approach to supporting those affected, which also includes psychosocial and trauma-informed care. The goal is to help stabilise those affected and support them in processing their experiences. These services are provided primarily by specialised counselling centres.

In Lower Saxony, specialised psychosocial support for victims of crime is also provided by the Victim Assistance Foundation. At its locations throughout the state, the foundation offers free, confidential counselling tailored to the individual's needs. To ensure the best possible accessibility, consultations take place either at

the victim assistance offices, during home visits, or at neutral locations. This safe environment enables victims to explain their situation and work with professionals to identify their individual support needs. The foundation's range of services includes practical guidance as well as legal and emotional support. A key component of trauma recovery is the comprehensive provision of psychosocial court support (PsPb), which provides professional guidance to particularly vulnerable victims – such as those affected by THB – throughout criminal proceedings. This includes providing important information on the course of the proceedings, legal representation in the context of civil actions and coverage of the associated costs.

In addition, the foundation assists victims in accessing benefits under social compensation law (SGB XIV) and helps secure financial assistance from the State Victim Assistance Fund as well as other institutions. To ensure a sustainable recovery, the foundation provides information on typical physical and emotional reactions following a crime and refers individuals to the "Trauma Network of Lower Saxony", as well as to further psychotherapeutic treatment.

North Rhine-Westphalia

Funding of the eight specialised counselling centres for female victims of THB for the purpose of sexual exploitation was increased by raising financial support for full-time equivalents from 16.5 to 17 in 2024.

Furthermore, financial resources for accompanying female foreign victims of THB for the purpose of sexual exploitation to appointments were adjusted in 2025 to reflect price increases.

Rhineland-Palatinate

Since the legal entitlement to psychosocial court support came into force, the number of assigned cases in Rhineland-Palatinate has risen continuously. Whereas in 2023 there were 50 assignments, 96 assignments were recorded in 2024. This indicates the progressive establishment of psychosocial court support in judicial practice in Rhineland-Palatinate. In Rhineland-Palatinate, 27 people are currently recognised as psychosocial court counsellors, including two who focus on supporting victims of THB.

In the field of psychosocial and psychological support for refugees – including, of course, those who have fallen victim to THB – Rhineland-Palatinate implements various measures. At the Land's reception centres for asylum seekers, a psychosocial service is funded or commissioned to provide needs-based support to residents, including crisis intervention, psychological counselling and therapeutic group sessions. In addition, psychosocial centres for refugees and victims of torture, operating at six locations in the Land and also providing needs-based psychosocial and psychotherapeutic services for refugees living in the municipalities, are funded.

Saarland

The specialised counselling centre ALDONA e.V. does not currently employ any psychologists in Saarland. In order to ensure psychosocial support for those affected until the start of appropriate therapy, specialist counsellors nevertheless offer bridging psychosocial counselling sessions, which help to stabilise the persons concerned.

Saxony

The KOBRA-net counselling centre, which specialises in victims of THB for the purpose of sexual exploitation and victims of so-called honour-related violence, provides psychosocial counselling and support during criminal proceedings, outreach social work, counselling and mediation services and also offers anonymous protection through accommodation in shelters at two locations with a total of four family places.

As of April 2026, a total of 27 psychosocial court counsellors are working in various victim support centres in Saxony. In both 2024 and 2026, training and further education measures were approved in Saxony via the organisation Opferhilfe Sachsen e.V. to train psychosocial court counsellors.

Thuringia

Based on the experience of the counselling centre for sex workers in Thuringia, affected persons require access to close, around-the-clock care.

13. Access to Work, Vocational Training and Education

“GRETA considers that the German authorities should strengthen effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training and job placement, raising awareness amongst employers, and the promotion of micro-businesses, social enterprises and public-private partnerships, including through state supported employment programmes, with a view to creating appropriate work opportunities for victims of trafficking.”

Bavaria

The German/Bavarian labour market is already open to all groups of people without discrimination, provided they hold a residence permit for employment purposes. From the perspective of the Bavarian State Ministry of Labour and Social Affairs (StMAS), the Bavarian Labour Market Fund, as a Land-funded programme for qualification and employment promotion, can also benefit all persons disadvantaged in the labour market.

Brandenburg

The Land of Brandenburg takes GRETA's recommendations seriously and is committed to improving access to the labour market for victims of THB. Existing measures are continuously being developed to strengthen the economic and social integration of affected persons. Existing and planned initiatives include:

Vocational training and job placement

Victims of THB should have access to targeted qualification and training programmes that improve their chances in the labour market. Co-operation between employment agencies, job centres and specialised counselling services must be expanded in order to provide individualised placement services. In order to access the labour market, victims from non-EU countries must regularise their residence status in Germany and obtain the appropriate visa.

Raising awareness among all relevant stakeholders

Employment agencies and social enterprises must be sensitised for the specific needs of victims in order to facilitate access to jobs and support services. Immigration authorities must also be sensitised to the issue of regularising the residence status of victims from non-EU countries. Numerous workshops and seminars on THB and forced labour have already been conducted for employment agencies and job centres. Further seminars are planned.

In Brandenburg, there are currently 14 municipal Welcome Centres that provide advice and support for labour market integration to people with a migration background. Staff at the Welcome Centres are trained on the topics of "labour exploitation, forced labour, and human trafficking", as well as victim protection. The Land of Brandenburg organises special workshops for this purpose.

Support for social enterprises

Market-oriented social enterprises (MSUs), comprising 140 enterprises, are of great importance for the Land of Brandenburg. A particular feature of the MSU landscape in Brandenburg is their presence in rural areas, whereby they act as important drivers of regional development.

Land-funded employment programmes can be used to develop co-operation structures to create suitable jobs for victims of THB. However, there are currently no existing partnerships in this area.

All these measures are intended to be intensified and expanded in the future in order to facilitate the transition of victims of THB into the regular labour market, promote their economic independence and support their social integration.

Hamburg

Hamburg is funding the "bereit&stark" project (verikom gGmbH) through the European Social Fund (ESF) for the period 2025 to 2028. The project offers career coaching to victims of violence, including victims of THB. The goal is to facilitate their (re)integration into vocational training and the labour market.

Lower Saxony

From a gender-equality perspective, the Land supports the call for strengthening effective access to the labour market for victims of THB and to promote their economic and social integration. The Land also supports the proposals on creating appropriate employment opportunities for victims of THB, including the provision of vocational training and job placement services, raising awareness among employers, and promoting micro-enterprises, social enterprises and public-private partnerships through Land-funded employment programmes.

North Rhine-Westphalia

In addition to providing information on social and labour rights for persons in precarious employment, the 53 "Beratungsstellen Arbeit" (BSA) offer initial career orientation for individuals seeking advice and otherwise lack access to the regular labour administration. For these individuals, the BSA ensure transitions into the standard benefit systems (job centres and employment agencies).

The BSA are part of the network of specialised counselling centres for workers in precarious or exploitative working conditions in North Rhine-Westphalia, which is co-funded by the European Social Fund (ESF) and the Land of North Rhine-Westphalia.

Thuringia

Based on the experience of the counselling centre for sex workers in Thuringia, job openings that require little or no knowledge of German – or, ideally, allow communication in the person's native language – are considered particularly useful.

14. Criminal Law, Investigations, Prosecutions, Sanctions and Measures

"GRETA also considers that the German authorities should continue taking measures to:

- conduct a comprehensive assessment of the effectiveness of the criminal law provisions concerning THB and related offences. The authorities should be prepared to readjust on the basis of such an assessment the content and/or the application of the relevant provisions with a view to addressing any shortcomings identified;*
- ensure that the liability of legal entities for criminal offences is effectively implemented;*
- develop the legal framework to enable the use of technological developments to gather digital evidence and strengthen the awareness of the subject of digital and technology-facilitated THB among state and non-state stakeholders."*

Baden-Württemberg

With regard to the recommendation to ensure that the duration of court proceedings in THB cases is reasonable, it should be noted that the scheduling and conduct of proceedings generally fall within the jurisdiction of the respective courts. This is carried out by the competent judges, who are objectively and personally

independent in accordance with Article 97 of the Basic Law. However, the Ministry of Justice and Migration promotes the expeditious conduct of proceedings through organisational measures, including the provision of sufficient human and material resources.

The police in Baden-Württemberg proactively investigate all THB offences, regardless of whether they have been reported or not. The investigative and prosecution strategies ensure this accordingly. Various types of evidence are collected through special investigative techniques and financial investigations, in order to avoid relying solely on the victims' statements.

In addition, investigations seek, to the greatest extent possible, to seize property used in the commission of THB offences or considered to constitute the proceeds of such offences.

Bavaria

In order to effectively prosecute the offence of THB, bring it to trial and convict the perpetrators on the one hand, and to provide victims of THB with the necessary support measures on the other, the co-operation agreement between the police, public prosecutor's office, specialised counselling centres, social authorities, immigration authorities and employment agencies for the protection of victim witnesses in THB offences was adopted in Bavaria as a joint announcement by the Land Ministries of the Interior, Justice and Labour and Social Affairs, Family and Women (see above).

Effective criminal prosecution is further supported by specialised departments and specialised judges, particularly in locations where a large number of cases of suspected THB occur.

The confiscation of the proceeds, means, products and objects of the offence is consistently pursued by the Bavarian law enforcement authorities.

Berlin

It is one of the fundamental principles of German criminal law that criminal proceedings must be conducted without undue delay. Furthermore, the specific principle of urgency applies whenever a defendant is held in pre-trial detention. To enable more effective prosecution of THB and forced prostitution, the Public Prosecutor's Office in Berlin has established a specialised department. The combination of this specialisation and the frequent practice of obtaining arrest warrants for suspected human traffickers may in consequence also expedite the court proceedings. The Berlin Public Prosecutor's Office assigns THB offences to Department 255, with the exception of THB for labour exploitation/forced labour. Department 246 of the Berlin Public Prosecutor's Office is responsible for this latter offence. This has led to close and trusting co-operation, which is crucial for the success of investigations in criminal proceedings. The specialised units for combating THB and exploitation at the Berlin State Office for Criminal Investigation (LKA Berlin) investigate all incoming leads proactively, utilising all available legal means (e.g. surveillance, internet investigations, wiretapping, searches, asset seizures). Furthermore, businesses and premises where prostitution takes place are inspected in accordance with the Berlin General Law on Public Safety and Order (ASOG Berlin).

Victim testimony continues to be regarded as essential for securing a conviction.

On 1 March 2018, the Berlin State Office for Criminal Investigation, unit 421 (LKA 421), assumed responsibility for the following areas within the Berlin Police Department: THB for the purpose of labour exploitation, exploitation in the commission of crimes, and exploitation in begging. Staff received appropriate training and awareness-raising measures. Since 1 January 2025, following a previous 18-month pilot phase, Berlin has been the only German state to have a "Joint Investigation Group on Labour Exploitation" (GEA), staffed equally by employees of the Berlin Police and the Berlin Main Customs Office. The intensified fight against labour exploitation, through the use of the respective agency-specific resources in operational investigations,

contributes to the swift progress of proceedings. In complex investigations, the transition from covert to overt phases and the evaluation of seized evidence have been significantly shortened. Furthermore, staff of both agencies benefit from the ongoing exchange of expertise, as well as the resulting specialisation and increased awareness.

Brandenburg

No specifications can be made regarding the duration of individual court proceedings or the scheduling of specific cases, as the timing and prioritisation of court proceedings are the responsibility of the courts and this is part of judicial independence. However, the Land of Brandenburg is committed to ensuring that the courts and public prosecutor's offices are staffed in accordance with operational requirements.

Otherwise, there are no Land-specific peculiarities. Furthermore, it follows from the principle of legality under section 152(2) of the Code of Criminal Procedure that the public prosecutor's offices are obliged to intervene in all prosecutable criminal offences where there are sufficient factual indications that a criminal offence has been committed.

Lower Saxony

From the perspective of the Lower Saxony Land government, asset forfeiture is an effective and key tool in the fight against crime. For groups of offenders involved in sexual violence and THB, financial investigations and asset forfeiture can be particularly relevant when digital payment flows, concealment mechanisms and logistical support structures are also identified in these areas.

Lower Saxony already pursues a strong "follow-the-money approach", which is further reinforced by nationwide developments. With the entry into force of the Act on the Recovery of Criminal Assets on 1 July 2017, asset forfeiture was simplified and existing loopholes in the system were closed. Nevertheless, there is still room for improvement. For this reason, the Land government is currently committed – and will continue to be committed in the future – to the successful application and implementation of existing legal instruments, as well as to the further development and optimisation of Act on the Recovery of Criminal Assets.

At their spring conference in 2024 – also in response to a motion submitted by the Land of Lower Saxony in conjunction with other Länder – the Ministers for Justice decided to continue the Federal-Länder working group on optimising asset forfeiture and requested that the then Federal Minister of Justice review the working group's recommendations and, where appropriate, implement them as quickly as possible.

Saarland

In the Saarland Police Directorate, cases of THB are handled centrally in the Department LPD 224 Human Trafficking/Smuggling of Migrants. Where necessary, investigations are supported by Department LPD 244 Financial Investigations/Money Laundering.

Saxony

Due to the comparatively low relevance of offences under sections 232, 232a and 232b StGB for the Saxon judiciary (210 proceedings at the prosecution authorities during the period from 1 January 2019 to 31 December 2019, see the report of GenStA dated 5 February 2019), measures aimed at detecting criminal offences and uncovering unreported cases of THB may appear to require further improvement.

15. Protection of Victims and Witnesses

“Furthermore, GRETA considers that the German authorities should take additional measures to strengthen the protection of victims and witnesses of THB, including by:

- *making full use of the existing measures to protect vulnerable victims and witnesses of THB and to prevent their re-traumatisation and intimidation during the investigation, as well as during and*

after the court proceedings, including by avoiding the repeated questioning of victims of trafficking and using pre-recorded statements in court;

- *building the knowledge of all actors in the criminal justice system on how to avoid re-victimisation and stigmatisation of victims of THB through training and awareness-raising, as well as prioritising the rights, needs and interests of victims.”*

Baden-Württemberg

In Baden-Württemberg, psychosocial support during criminal proceedings and witness support help victims of THB throughout the criminal justice process. This is a specialised form of non-legal support provided to particularly vulnerable victims before, during and after the trial. Its goal is to reduce the stress associated with criminal proceedings for victims and, ideally, to prevent their secondary victimisation. To this end, it includes the provision of information, as well as qualified care and support in criminal proceedings, particularly in the context of interactions with authorities and direct confrontation with the alleged perpetrators, such as during interrogations and the trial. Subject to the statutory requirements, it is also available free of charge to victims of THB. The coordination office for psychosocial support during criminal proceedings established at PräventSozial gGmbH, which receives annual funding of €75,000, also contributes to further strengthening this institution in Baden-Württemberg. The coordination office, which has Land-wide jurisdiction, is responsible for professional quality development as well as networking and coordination tasks. Injured persons from across the Land can contact the PräventSozial Coordination Office for assistance throughout criminal proceedings. From there, they will be referred to the appropriate local legal support specialists. With regard to training and awareness-raising measures aimed at preventing re-victimisation and stigmatisation during interrogations conducted by judges and public prosecutors, please refer to the training programme described in the response to section 16.

Bavaria

The Bavarian police are aware of the potential distress that victims and witnesses may experience during investigations and take the necessary measures in individual cases to minimise this as far as possible. In principle, all police officers in Bavaria are trained to deal professionally with victims of THB and victims of violence, among other things, and to inform them about suitable support services. Various information material and references to regional and supra-regional counselling and support services are also available on the Bavarian Police's intranet (Intrapol) website.

In the case of offences relating to THB, the Bavarian public prosecutor's offices always check whether it is necessary to conduct a judicial examination for the purpose of securing evidence and whether an audiovisual recording of the judicial examination is necessary in order to avoid particularly incriminating multiple statements (section 58(1) sentence 2 no. 2 of the Code of Criminal Procedure). In addition, the public prosecutor's office is to be made aware, in particular through the co-operation agreement mentioned under section 8, which is currently being revised, of the need to examine whether, in the case of an offence committed by the person concerned, it is possible to refrain from prosecution in accordance with section 154c(2) of the Code of Criminal Procedure, provided that this is not precluded by the seriousness of the offence (cf. also no. 102 RiStBV).

Furthermore, witnesses may be assigned a witness counsellor or psychosocial court support. The aim of psychosocial court support is to reduce the stress caused by the criminal proceedings, avoid secondary victimisation (renewed traumatisation as a result of the proceedings) and stabilise the witness' ability to testify.

Please refer to points 1 and 16 for answers regarding training. The Munich I public prosecutor's office holds regular exchange meetings with the Jadwiga specialised counselling centre, with a particular focus on the perspective of the victims.

Furthermore, staff participate in international conferences on THB and victim protection (e.g. CBSS conference in Stockholm Dec 2025; Expert Group Meeting on Protection of Victims in THB – UNODC in Vienna March 26; PACTS-Project – UNODC in Vienna and Marrakesh Dec 24 and June 26).

Berlin

The Land of Berlin has established a witness support office at the Criminal Court, where witnesses receive psychosocial support and counselling prior to criminal proceedings. In addition, witnesses are accompanied to the main hearing if needed.

The signing of the above-mentioned co-operation agreements in August 2024 strengthened the prioritisation of the victims' rights, needs and interests through the immediate involvement of specialised counselling centres. Furthermore, the Berlin Police have specialised departments to combat THB, whose staff have knowledge of how to prevent re-traumatisation and intimidation during investigations.

Lower Saxony

In Lower Saxony, work is currently underway to implement further projects aimed at the intensive use of appropriate interrogation methods for particularly vulnerable victims and witnesses. These projects are designed to facilitate the verbatim recording of interrogations, for example through the comprehensive equipping of courtrooms with hardware and software for conducting video hearings, as well as through automated, AI-supported transcription of spoken language into written form.

In addition, there are training programmes for judicial officials that focus on raising awareness regarding the questioning of particularly vulnerable victims and witnesses, or that are designed to facilitate the technical and legal handling of audiovisual interrogations.

North Rhine-Westphalia

For several years now, seminars on the questioning of victim witnesses have been offered in the annual training programme of the North Rhine-Westphalia Judicial Academy. The target group for these seminars are judges, public prosecutors and district attorneys. In these seminars, participants are made aware of how to deal with (traumatised) victim witnesses in order to conduct interrogations sensitively and efficiently, taking into account any psychological symptoms. A special offer is available for investigating judges who work in a child protection context. The aim is to reduce the number of interrogations in order to minimise any resulting stress and re-traumatisation. Training in interviewing techniques is beneficial in this context.

Saarland

The Saarland Police Directorate has appointed a full-time victim protection officer for the implementation of victim protection, as well as one victim protection officer for each operational police unit. These persons serve as qualified contact points, including for victims of THB. Victims are also referred to suitable victim support services. In addition, cooperation agreements exist with victim support organisations (e.g. WEISSER RING or ALDONA e.V.). The topic of victim protection is also addressed in depth in police education and further training: Training for the senior police service at the Saarland University of Applied Sciences for Administration comprises several relevant study programmes. In the subject of criminology, compulsory "team teaching" is carried out with the victim protection officer. The teaching includes: the tasks of victim protection officers and other relevant staff, the basics of victimology, the rights of victims, case studies, support services, assistance centres and online resources for victim protection. The topic "Victim Protection and Victims' Rights" is covered in the main study programme (second and third academic year) in the Department of Police Science, Criminology. As part of police training, victim protection and victims' rights (specialised knowledge and application) are taught by the victim protection officer of the Saarland Police Directorate as part of the criminal investigation qualification course. In addition, further specialised training courses on victim

protection are offered for victim protection officers at the police stations and staff working in this field. The victim protection officer and co-operation and network partners such as WEISSER RING e.V. are always involved in these training activities.

Saxony

The topic of trauma-sensitive questioning is the subject of the Land's annual "Questioning of Children" conference. As part of the supra-regional conferences of the Central Germany Initiative, the above-mentioned topic is addressed in the conference series "Fragen und Vernehmen" (Questioning and Interrogating). As part of the supra-regional conferences of the Association of Northern German States, the above-mentioned topic is addressed in the regular conference "Expertise in Juvenile Criminal Law according to section 37 JGG".

This area will also be covered in the following further DRA training courses:

- "Sexual Offences and Forced Prostitution",
- "Sentencing, Victim Protection and Adhesion Proceedings";
- "The Main Hearing in Criminal Matters";
- "Fundamentals of Juvenile Criminal Law",
- "Youth Protection Proceedings with a Focus on Sexual Offences",
- "Forensic Questioning of Children – Possibilities and Limitations of Video Interrogation",
- "Interrogation/Hearing of (Child) Victim Witnesses".

16. Specialised Authorities and Co-ordinating Bodies

"While welcoming the existence of police officers and prosecutors specialised in dealing with THB in many Länder, GRETA considers that the German authorities should promote further specialisation to deal with THB, including of judges, and provide systematic and periodically updated training to police officers, prosecutors, judges and other relevant professionals which covers the rights of victims of THB and the importance of preventing secondary victimisation."

Baden-Württemberg

Judges and public prosecutors in the Baden-Württemberg judiciary have access to a range of professional development opportunities featuring relevant events. This professional development programme for judges and public prosecutors at the Ministry of Justice and Migration is structured in several phases. Initially, the Land plans and organises its own training programmes. In addition, training programmes are planned that are then organised by the German Judges Academy (DRA), in which judicial staff from other Länder may also participate. Conversely, judicial staff in Baden-Württemberg have the opportunity to participate in events planned by other Länder or the Federal Government and organised by the DRA. External training events are also regularly advertised. Various relevant training programmes are offered at Land level. The mandatory introductory sessions for judges and public prosecutors include a two-day segment on the topics of "Testimony Psychology and Interrogation Theory" and also address victim protection aspects such as secondary victimisation. The regularly offered course "The Interrogation of Children in Criminal Proceedings" examines practical skills in interrogation techniques on the one hand, and issues of procedural law pertaining to juvenile protection proceedings on the other. In particular, the course focuses on the investigative work of the public prosecutor's office, as well as the main hearing in juvenile protection proceedings. In 2025, the two-part continuing education series "Consequences of Trauma" I and II was offered. "Consequences of Trauma II – Trauma-Related Disorders and Their Impact on Communication" begins with a brief overview of trauma-related symptoms and then examines their effects on the communication experiences and behaviour of those affected, thereby in particular promoting trauma-sensitive questioning by judges and public prosecutors. It is also worth noting the annual interdepartmental "Child Protection Day," which will be held for the 17th time in 2026. The symposium will be organised in 2026 by the Ministry of the Interior, the Ministry of Justice, the

Ministry of Culture, the Ministry of Social Affairs, and the KVJS Youth Welfare Office, and, in addition to presentations, will primarily serve as a platform for exchange among the participating stakeholders. It will address aspects of child protection that may be relevant in relation to THB and the appropriate treatment of children as victims and witnesses. The continuing education programme is supplemented by events organised by the DRA. Of particular note are events such as the conference "Sexual Offences and Forced Prostitution," which is specifically designed to promote understanding of victims and appropriate ways of interacting with them. The role of the victim in investigative and criminal proceedings is examined and topics such as trauma research, witness psychology and specific aspects of victim protection are addressed. Also worth noting is the conference "Interrogation/Hearing of (Child) Victim Witnesses," which is designed to enable judges to appropriately interrogate or hear children who have been victims of or witnesses to violence or traumatic events from the perspectives of communication psychology, developmental psychology and law.

The training and further education content of the Baden-Württemberg Police is constantly adapted to the current needs, developments and legal requirements. A central element of police training is the standard training profiles. Based on the contents of the training for the intermediate police enforcement service, as well as the studies for the senior police enforcement service, the standard training profiles describe the required and specific competences on a task-related basis. This classification also applies accordingly to the needs-based empowerment of employees in the context of the Council of Europe Convention on Action against THB.

The police officers in the area of THB have a high level of technical expertise. In addition to the specialised red-light departments, the State Office of Criminal Investigation in Baden-Württemberg has the Joint Investigation Group on Smugglers, in which experts from the Land and Federal Police work together in an interdisciplinary manner to combat complex structures of smuggling crime and the often associated THB in a sustainable manner.

Bavaria

Serious offences of THB and exploitation are usually dealt with by the relevant specialised departments of the criminal investigation department. These are the State Office of Criminal Investigation and, in the case of the state police headquarters, the criminal investigation departments with centralised tasks as well as the criminal investigation departments and stations. At Munich Police Headquarters, Criminal Investigation Department 3 is responsible and at Middle Franconia Police Headquarters, Criminal Investigation Department 4 is responsible. The Bavarian Police therefore have sufficient specialisation in this area.

Specialised training courses on the subject of THB are available at the Bavarian Police Training Institute. The Bavarian State Office of Criminal Investigation also regularly organises a workshop on THB to enable specialised investigators to exchange expertise and gain further in-depth knowledge. Bavarian police officers also take advantage of national and international training and conference programmes. One example of this is the possibility of using the further training programme offered by the Austrian Security Academy. The Bavarian Border Police also provide operational forces that have acquired in-depth expertise in cross-border offences such as THB.

Several Bavarian public prosecutor's offices have special responsibilities for handling THB offences.

The training programme, which is available to colleagues from the courts and public prosecutor's offices in Bavaria, also includes the topic of "(international) THB". The programme is continuously evaluated and further developed as required.

Berlin

The GJPA intends to offer a new training course on the topic of "Human Trafficking" in 2027. The target group for this one-day event is judges and public prosecutors. The aim of the training is to enable further specialisation within this target group. The prevention of secondary victimisation and victims' rights after crimes in general are already addressed in the regularly conducted victim protection training courses. Examples include the courses "Fundamentals of Interviewing Traumatized Individuals and Dealing with Traumatized Children," "Psychological and Psychotraumatological Interrogation in Criminal Proceedings Pursuant to section 58a of the Code of Criminal Procedure," and "Violence Against Women: Misogyny, Femicide and So-called Honour-related Violence"

The Berlin Police have specialised departments to combat THB in accordance with the above recommendation. Within the department to combat THB, there are three units specialising in labour exploitation (adults), other forms of THB (adults) and all forms of trafficking of minors.

Brandenburg

In the Land of Brandenburg, proceedings relating to THB with links to organised crime are conducted centrally by the public prosecutor's office in Frankfurt (Oder) as the main public prosecutor's office for combating organised crime, cross-border gang-related or commercial property crime and money laundering. If the offence is not related to organised crime, proceedings for THB are usually conducted in specialised departments of the local public prosecutor's offices responsible for sexual offences (in the case of sexual exploitation) or economic offences (in the case of labour exploitation).

Lower Saxony

The Lower Saxony Ministry of Justice is continuously assessing whether the establishment of a state-wide specialised public prosecutor's office for THB offences, pursuant to section 143(5) of the Courts Constitution Act (GVG), would enable more effective prosecution. To date, due to the overall low number of cases, there appears to be no operational need for such a specialised public prosecutor's office at the Land level. The Attorney General, the Senior Attorneys General and the Chief Senior Attorneys are examining measures for centralisation within their respective areas of responsibility. In numerous public prosecutor's offices in Lower Saxony, THB offences are handled in departments for organised crime and – in cases of labour exploitation – in departments for economic crimes.

North Rhine-Westphalia

The Judicial Academy of North Rhine-Westphalia regularly organises seminars for judges and public prosecutors on the topic of "THB" as well as "sexual exploitation". In addition, seminars on general criminal law relating to sexual offences in connection with psychosocial court support raise awareness of the special needs of trafficked persons. Furthermore, the importance of preventing secondary victimisation is consistently addressed in seminars on interrogation theory.

Saarland

In Saarland, all cases of THB are centrally handled by Department LPD 224 THB/Smuggling Crime. Accordingly, a high level of specialisation among case officers is ensured. These officers participate in training events organised by the BKA in this field and regularly exchange expertise with specialised police units in other Länder through case officer conferences. The Saarland Ministry of Justice also offers extensive training programmes for staff within its remit. This also includes the training programme of the German Judicial Academy (DRA). The following training courses are regularly and continuously offered and at least partially address the specific topic area of "THB":

- International Co-operation in Criminal Matters (DRA – 03c)

- Criminal Law Measures to Combat Terrorist Financing (DRA – 05c)
- Law Without Statute, Justice Without Judges – The World of Shadow Justice (DRA – 19c)
- Sexual Offences and Forced Prostitution (DRA – 21d)
- International Human Rights Protection (DRA – 26b)
- Organised Crime (DRA – 34a)

Saxony

Regular training courses are organised for police officers on the subject of THB. No conferences on the subject of THB are held.

Thuringia

To raise awareness and improve the ability to identify such offences during operational and patrol duties, this topic is an integral part of police training for mid-level and senior-level law enforcement officers. In the senior-level service in particular, the elective module delves deeper into these topics and covers their legal implementation, including through the use of audiovisual interrogations. In addition, the topic is addressed in continuing education programmes.

17. Gender-Sensitive Approach to Access to Justice for Victims of THB

“GRETA considers that the German authorities should promote a gender-sensitive approach to access to justice for victims of THB, including through gender mainstreaming and training of relevant officials.”

Baden-Württemberg

The three specialised counselling centres for victims of THB for the purpose of sexual exploitation provide training for various professional groups.

Berlin

The training course on "THB", currently planned for 2027, should also address barriers to access to justice for victims of THB. This includes strengthening the gender sensitivity of judges and public prosecutors. In more general terms, this aspect is also addressed in other regularly offered training courses provided by the GJPA that are not limited to "THB", for example training courses on federal and Land statutes against discrimination and on intercultural competence. In addition, supra-regional training opportunities are available, particularly through the German Judicial Academy (DRA) or the European Judicial Training Network (EJTN), which also address gender-specific issues and corresponding perspectives.

According to Berlin's General Rules of Procedure (GGO), equal treatment of women and men must be observed. Furthermore, in January 2025, the Berlin Police's Central Office for Prevention published "Recommendations for Discrimination-Sensitive Language Use." Staff in the specialised departments always treat (potential) victims of THB with respect and are also encouraged to use gender-sensitive communication.

Brandenburg

In the further training on THB planned by the Joint Legal Examination Office of the Länder Berlin and Brandenburg for 2027, any barriers to access to justice for victims of THB will also be addressed. This also includes increasing awareness of gender aspects. In general, this aspect is also addressed in other training courses offered by the Joint Legal Examination Office of the Länder Berlin and Brandenburg that do not specifically deal with the offence of "THB", for example in the context of training courses on AGG, LADG and intercultural competence. In addition, supra-regional further training programmes are available, in particular within the framework of the German Judicial Academy (DRA) or the European Judicial Training Network (EJTN), in which gender-specific issues and corresponding perspectives are also addressed.

North Rhine-Westphalia

The Judicial Academy of North Rhine-Westphalia regularly organises seminars for judges and public prosecutors on the topic of "THB" as well as "sexual exploitation". The event "Criminal Law – Human Trafficking and Sexual Exploitation" takes place every two years, most recently in 2025. It is planned again for 2027. A total of 13 participants attended in 2023 and nine participants attended in 2025.

North Rhine-Westphalia organises the annual nationwide conference at the German Judicial Academy "Sexual Offences and Forced Prostitution", which also deals with specific issues. The event was attended by three participants from North Rhine-Westphalia in 2023, five in 2024 and one in 2025. As things stand, there are two registrations from North Rhine-Westphalia for this year. In addition, seminars on general criminal law relating to sexual offences in connection with psychosocial court support raise awareness of the special needs of trafficked persons. Furthermore, the importance of preventing secondary victimisation is consistently addressed in seminars on interrogation theory.

18. Efforts to Prevent and Combat THB for the Purpose of Labour Exploitation

“GRETA considers that the German authorities should intensify their efforts to prevent and combat THB for the purpose of labour exploitation, taking into account GRETA’s Guidance Note on combating trafficking for labour exploitation and the CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, in particular by:

- *ensuring that sufficient staff and resources are made available to FKS to enable it to play a frontline role in the prevention and identification of THB for the purpose of labour exploitation, and in the collection of data on identified victims;*
- *ensuring that FKS, the police and other relevant stakeholders increase their capacity to detect and identify victims of THB for the purpose of labour exploitation, paying particular attention to at-risk sectors, such as construction, logistics and agriculture;*
- *ensuring that there is a separation in FKS between its inspection role concerning exploitative labour conditions and its other policing tasks, and that FKS inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB;*
- *further strengthening the monitoring of recruitment and temporary work agencies;*
- *implementing additional measures to prevent abuse of domestic workers, including developing the conditions under which access to private households can be granted for labour inspection;*
- *strengthening co-operation between FKS, police, trade unions and other civil society actors, with a view to collecting evidence necessary for successfully investigating and prosecuting cases of THB for the purpose of labour exploitation.”*

North Rhine-Westphalia

The Ministry of Labour, Health and Social Affairs of North Rhine-Westphalia (NRW) supports a network of specialised counselling centres for workers in precarious or exploitative working conditions. These counselling centres provide comprehensive information on social and labour rights and support individuals in enforcing them.

The network includes 53 “Beratungsstellen Arbeit” (BSA), regional counselling centres providing advice and support on labour and social rights, a legal advice office and the “Beratungszentrum gegen Arbeitsausbeutung und Menschenhandel NRW” (BEAM), a specialised counselling centre for victims of labour exploitation and THB, operated by “Arbeit und Leben NRW”, an adult education and counselling organisation in North Rhine-Westphalia.

All staff have been trained to identify victims of labour exploitation and THB.

While victims can receive initial counselling at any counselling centre that is part of the network, the BEAM project is specifically dedicated to victims of trafficking for labour exploitation. BEAM offers tailored support, including an initial assessment to clarify the individual's situation and information on legal rights.

The network ensures a seamless referral process to BEAM for all identified victims. These services are co-funded by the European Social Fund (ESF) and the Land of North Rhine-Westphalia.

Also see section 9.

Saarland

In Saarland, the specialised department for THB/Smuggling Crime maintains close contact and exchanges information with the Financial Control of Undeclared Work Unit (FKS) of the Saarbrücken Main Customs Office. This takes place both on a case-by-case basis and through an institutionalised working group that meets regularly.

Schleswig-Holstein

Since 2016, the Schleswig-Holstein's Ministry of Economic Affairs, Transport, Labour, Technology and Tourism has been funding a counselling centre for EU workers on labour and social law issues as part of a project. Since 1 January 2026, the project has been implemented by the Anti-Discrimination Association of Schleswig-Holstein (Antidiskriminierungsverband Schleswig-Holstein (advsh) e.V. – in Schleswig-Holstein aktiv gegen Diskriminierung). The aim of the funding is to promote fair freedom of movement and labour mobility for the target group.

19. Training on Identification of Victims of THB

“Furthermore, GRETA considers that the German authorities should continue and further strengthen their efforts to proactively identify victims of trafficking by reinforcing the capacity and training of all relevant officials, including at the municipal level.”

Baden-Württemberg

The three specialised counselling centres for victims of THB for the purpose of sexual exploitation provide training for various professional groups.

The design and planning of the training programme are guided by developments in practice as well as the needs of judges and public prosecutors. To this end, regular needs assessments are conducted to identify training requirements and preferences as accurately as possible. In recent years, the importance and proportion of training events focusing on so-called “soft skills” have steadily increased. This includes, in particular, the appropriate treatment of victims of crime, including the examination of witnesses and the hearing of children in family court proceedings.

Baden-Württemberg police officers receive training and are sensitised to the issue of THB through a variety of formats. Relevant content is incorporated into the study programmes for senior police officers, as well as into further training and in the form of guidelines. These measures are subject to an ongoing development process.

Bavaria

The Free State of Bavaria recently (from July 2023 to December 2025) supported a training project of the Jadwiga counselling centre. The aim of this project was to raise awareness among all staff of registration authorities and health departments about THB under the Prostitute Protection Act, to familiarise them with indicators and to improve co-operation with other authorities.

Berlin

The specialised units for combating THB and exploitation at the Berlin State Office for Criminal Investigation conduct an annual seminar on THB for police officers to raise awareness of this phenomenon.

Regular working meetings are held with representatives of the police precincts in whose jurisdictions, for example, red-light districts are located.

As needed or upon request, professional exchange takes place with staff of other authorities (e.g. youth welfare offices, immigration authorities and outreach workers) who may come into contact with victims of THB and exploitation.

Brandenburg

Both the police and the counselling centre specialising in THB regularly conduct training on the topic. Since the beginning of 2026, these training activities have also been expanded to the municipal level.

Hamburg

KOOFRA offers training for various professionals who may come into contact with victims of THB. In 2024 and 2025, training was provided to, among others, the police, the Pro*BEA unit (Counselling, Permits, and Registration under the Prostitute Protection Act) of the Social Services Department, women's shelters, refugee centres, emergency shelters and social and labour law advisers at various counselling centres.

Mecklenburg-Western Pomerania

Please refer to the comments under section 9.

Lower Saxony

The Ministry of Justice of Lower Saxony continuously assesses existing training needs in the judicial sector. Please refer to the comments under section 24.

North Rhine-Westphalia

The Judicial Academy of the Land of North Rhine-Westphalia regularly offers seminars for judges and public prosecutors on the topics of "THB" and "sexual exploitation". Special mention must be given to the event "Criminal Law – Human Trafficking and Sexual Exploitation", which takes place every two years in odd-numbered years, most recently in 2025 and again planned for 2027. A total of 13 participants attended in 2023 and nine participants attended in 2025.

For the BEAM- and Loverboy project please refer to section 9.

Rhineland-Palatinate

Continuing education for judges and public prosecutors in the field of THB continues to form a regular part of the programme of the German Judicial Academy, which is also open to judges and public prosecutors from Rhineland-Palatinate.

Examples from previous years include:

- 05a 05/02–09/02/24 International Human Rights Protection
- 36a 18/11–21/11/24 Sexual Offences and Forced Prostitution
- 18c 10/06–13/06/25 Sexual Offences and Forced Prostitution
- 21d 28/06–01/07/26 Sexual Offences and Forced Prostitution
- 26b 14/09–18/09/26 International Human Rights Protection

From 08/12/25 to 09/12/25, the Academy of European Law organised the event "Criminal Law and Human Rights: Current Case Law of the ECtHR", which was also open to judges and public prosecutors from Rhineland-Palatinate.

Saarland

There are currently no specific training courses for the identification of victims of THB within the Saarland Police. However, staff of the specialised counselling centre ALDONA take part in police training courses on THB once or twice a year. In addition, staff of the specialised department regularly take part in training courses organised by the BKA. The registration authority responsible throughout Saarland under the Prostitutes Protection Act (ProstSchG) is based at the Saarbrücken Regional Association and maintains close co-operation with the specialised counselling centre ALDONA, which also incorporates the counselling centre for persons in prostitution. For example, there is intensive professional exchange between the specialists involved, which ensures continuous flow of information on current developments in the field of THB. Indicator lists, which are developed and distributed by the specialised counselling centre, support the staff of the registration office in identifying potential victims of THB during the counselling sessions required under the Prostitution Protection Act. In addition, the specialised counselling centre ALDONA e.V. offers a weekly open consultation hour at the Saarbrücken Regional Association, enabling persons in prostitution to receive comprehensive counselling regarding their personal situation.

In Saarland, the staffing capacities of the specialised counselling centre were most recently expanded in 2025 in order to further develop its services, particularly in the area of prevention. As a result, an additional service was established, aimed in particular at schools and professionals working in the field of education. Furthermore, additional services were introduced for staff of youth welfare offices, which they use extensively.

20. Assistance to Victims of THB

"Furthermore, GRETA considers that the German authorities should make additional efforts to ensure that:

- access to assistance for victims of THB is not made conditional on their willingness to co-operate in the investigation or prosecution;*
- specialised counselling centres have sufficient human and financial resources to adapt their capacity to demand."*

Baden-Württemberg

In Baden-Württemberg, the Ministry of Social Affairs funds three recognised specialised counselling centres for victims of THB for the purpose of sexual exploitation, as well as additional safe accommodation facilities for this group.

Bavaria

The specialised counselling centres Jadwiga and SOLWODI Bavaria, funded by the Free State of Bavaria, advise affected persons regardless of their willingness to cooperate with law enforcement authorities. If necessary, they organise protected accommodation. Otherwise, reference is made to section 12.

Berlin

Access to support and counselling services for victims of THB is provided regardless of whether victims are willing to cooperate with law enforcement authorities. Specialised counselling centres play a central role in this regard. SenASGIVA supports efforts to strengthen their financial and human resources in order to meet needs within the limits of available budgetary funds.

Mecklenburg-Western Pomerania

Please refer to the comments under section 12.

North Rhine-Westphalia

Victims of THB may contact the Victims' Commissioner of the Land of North Rhine-Westphalia at any time and unconditionally and receive support there.

Please also refer to the response to sections 10 and 12.

Saxony

The specialised counselling centre KOBRA-net offers support services for victims of THB for the purpose of sexual exploitation, regardless of their willingness to cooperate with investigations or criminal proceedings. Expansion due to the Violence Assistance Act (see section 9).

Thuringia

bekom thüringen – a specialised and independent counselling centre for victims of THB and third parties in Thuringia, offering multilingual information – operates independently of governmental, political, religious or similar institutions. It received initial financial support from the Thuringian Ministry of Justice, Migration and Consumer Protection during its founding phase and continues to receive project funding.

In this regard, the counselling centre for sex workers in Thuringia advocates the introduction of a set of quality criteria for such counselling centres, which could also be recognised through a seal of approval to ensure high-quality services. Such a set of criteria has already been developed by KOK.

21. Residence Permits

“GRETA considers that the German authorities should take further steps to ensure that victims of THB can benefit in practice from the right to obtain a residence permit, including owing to their personal situation, without prejudice to the right to seek and enjoy asylum. The authorities should review the application of the system for granting residence permits to victims of trafficking with a view to ensuring that the victim-centred approach which underpins the Convention is fully applied.”

Baden-Württemberg

The Karlsruhe Regional Council has established a specialised unit dedicated to foreign nationals who are victims of THB, in order to provide shelters with a contact point for enquiries and to ensure the prompt processing of immigration-related matters. These institutions have the option of reporting such cases to the Karlsruhe Regional Council. The Karlsruhe Regional Council then notifies the competent lower immigration authority and immediately orders the granting of a temporary residence status so that affected persons can receive the appropriate benefits. The temporary residence status is issued by the lower immigration authority. Affected persons are then granted a hearing regarding their continued stay in Germany. At this stage, they are given the opportunity to comment on the planned decision within a two-week period. The three-month reflection and stabilisation period begins upon notification of the decision. If affected persons are in the asylum process, they are also referred to the BAMF.

Part III: Invites

22. International Co-operation

“GRETA welcomes the efforts made by Germany in the area of international co-operation against THB, including the participation in JITs and the engagement in EMPACT, and invites the German authorities to continue developing multilateral and bilateral co-operation in combating human trafficking.”

Baden-Württemberg

At the operational level in Baden-Württemberg, there is close coordination with the BAMF, whereby findings relating to THB are channelled in a structured manner to the LKA BW. In international crime complexes,

mirror proceedings are conducted and Joint Investigation Teams (JITs) are established to prosecute perpetrators and protect victims in the best possible way.

Berlin

The Berlin Police engages in multilateral and bilateral co-operation as recommended (e.g. participation in the EU-financed project "THB liberi").

Lower Saxony

Lower Saxony has a specialised unit, the Central Office for Organised Crime and Corruption (ZOK), which provides advice and information to the public prosecutor's offices in the Land. Among other things, the ZOK advises these offices on matters of international co-operation and performs the duties of Lower Saxony's contact point for the European Judicial Network in accordance with section 14 of the European Judicial Network Act (EJG). In this capacity, the ZOK handles approximately 100 cases per year. The role of the contact point is not to replace mutual legal assistance proceedings conducted by Lower Saxony's law enforcement authorities, but rather to facilitate them by connecting the relevant parties. This allows for the expedited processing of time-sensitive requests, as well as the resolution of communication issues or obstacles.

North Rhine-Westphalia

Judicial co-operation with other states within the European Union is carried out in accordance with European legal provisions that have been transposed into national law.

As part of foreign policy, the organisation of international co-operation in criminal matters falls within the competence of the Federal Government. The Land of North Rhine-Westphalia regularly contributes to the development of European regulations, the negotiation of international treaties and federal legislation, particularly in light of its extensive practical expertise. In addition, the Land of North Rhine-Westphalia ensures, through regular meetings, further training and information provided via the Land's judicial intranet, that in particular the department heads of the public prosecutor's offices of the Land of North Rhine-Westphalia who are directly involved in mutual legal assistance cases are familiar with the instruments of mutual legal assistance and are well networked so that corresponding opportunities for international co-operation – regardless of the type of offence – can be fully utilised.

The second intergovernmental consultations between the Netherlands and the Land of North Rhine-Westphalia in December 2020 laid the foundations for cross-border co-operation to combat the exploitation of temporary agency workers in the border region. To protect temporary agency workers from EU Member States against exploitative accommodation and employment practices, the state government of North Rhine-Westphalia, in co-operation with the local authorities concerned, has carried out several large-scale inspections of such accommodation, with the involvement of the German and Dutch occupational safety and health authorities and the European Labour Authority (ELA). At the third intergovernmental consultation in March 2025, the commitment to continue and expand this co-operation was reaffirmed. Furthermore, the Netherlands and North Rhine-Westphalia agreed to strengthen the co-operation between counselling centres for migrant workers on both sides of the border.

Saarland

The Saarland Police Directorate regularly participates in the EMPACT action days. Should it become necessary to initiate or participate in JITs in cases of THB, the Saarland Police Directorate will ensure its participation.

Saxony

Co-operation already takes place at the operational level within the police stations.

Thuringia

The Thuringian Police supports EMPACT initiatives focused on THB, for example through participation in targeted checks, and promotes these initiatives through press and public relations activities.

23. Engagement with the Private Sector

“GRETA invites the German authorities to further strengthen engagement with the private sector, in line with the UN Guiding Principles on Business and Human Rights and Council of Europe Committee of Ministers Recommendation CM/Rec(2016)3 on human rights and business and CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, with a view to raising awareness of the role and responsibility of businesses in supporting the rehabilitation and recovery of victims, and facilitation access to remedies.”

Berlin

From the perspective of the Berlin Senate Department of Labour responsible for combating THB for the purpose of labour exploitation, Berlin supports the further strengthening of structured engagement with businesses in line with international standards, in particular to increase awareness, promote due diligence and improve access to remedies for victims of labour exploitation.

Brandenburg

The Land of Brandenburg acknowledges the importance of engaging with the private sector in line with the UN Guiding Principles on Business and Human Rights and the Council of Europe's recommendations. At present, no formal partnerships exist in this area. Social enterprises, however, provide a valuable foundation for future co-operation. Efforts will continue to raise awareness among businesses regarding their responsibilities towards victims of THB and to facilitate and expand access to support services and legal remedies.

24. Criminalisation of the Use of Services of Victims of THB

“GRETA notes that the use of services from victims of THB for purposes other than sexual exploitation is still not criminalised and invites the German authorities to establish as a criminal offence the use of services of victims of trafficking, with the knowledge that the persons concerned are victims, for forms of exploitation other than sexual exploitation, in accordance with Article 19 of the Convention.”

Lower Saxony

The Ministry of Justice of Lower Saxony is continuously assessing existing training needs in the judicial sector. Once the announced federal law revising the criminal offences relating to THB is in place, training programmes at Land level that incorporate these new provisions can be reviewed.