



BUNDESVERBAND
NORDISCHES
MODELL

Zur Umsetzung des
Gleichstellungsmodells
in Deutschland e.V.

Alternative Report

Convention on Preventing and Combating Violence
against Women and Domestic Violence

1st thematic evaluation round: Building trust by delivering
support, protection and justice

Oktober 2025

Our Members



**AK STOP
SEXKAUF
DURLACH**



**AUGSBURGER/INNEN
GEGEN
MENSCHEN
HANDEL**

Blickfeld
Menschenhandel
Schützen durch Prävention.



KARÖ e.V.
Mut. Selbstbestimmung. Leben.
Der Mensch ist keine Ware!

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FRAUENGEMEINSCHAFT
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Diözesanverband Aachen

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überparteilich unabhängig fokussiert



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Partei DIE FRAUEN**

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BÜNDNIS HEIDELBERG**

**FRAUEN
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Ludwigsburger
Bündnis gegen Menschenhandel
und IZwangs-I Prostitution
in Stadt und Landkreis Ludwigsburg



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für das Nordische Modell und gegen
Menschenhandel und (Zwang)Prostitution

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Solidarity with women in distress
Solidarität mit Frauen in Not

SOLWODI
Solidarity with women in distress
Solidarität mit Frauen in Not
Solwodi Baden-Württemberg e.V.



ZEROMACHO
Männer gegen NEIN zur Prostitution

**TERRE DES
FEMMES**
ÖSTERREICH
Menschenrechte für die Frau
Gleichberechtigt, selbstbestimmt und frei

**FREIHEIT
FÜR
FRAUEN**
Chancengleichheit
& Empowerment

Rosenheim
gegen Gewalt an Frauen,
gegen Prostitution
(Prostitution ist Gewalt an
Frauen) und
gegen Menschenhandel -
RoNoPro

**Bremer
Netzwerk:
Sexkauf
Nein!**

**NETZWERK
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List of Members// As of October 2025

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This alternative report on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence was submitted by the Board of the Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e.V. (BVNM) to GREVIO, the monitoring body of the Council of Europe, in its English version on 27th October 2025.

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Table of Contents

Federal Association for the Nordic Model – for the Implementation of the Equality Model in Germany e.V. – Introduction-	3
Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence	3
Artikel 7: Comprehensive and co-ordinated policies Question 1.....	3
Artikel 7 Answer to question 1, first sentence: Information on new policy development	3
1. CDU/CSU parliamentary group: PRO punishment of sex purchase, 2023.....	4
2. Former Federal Chancellor Olaf Scholz, SPD: Sex purchase not acceptable, 2023	4
3. Hearing, Bundestag, Family Affairs Committee, 2024	4
4. National Action Plan against to Prevent and Combat Trafficking in Human Beings and Protect Trafficked Persons	5
5. Coalition Agreement 2025: Germany, a hub for human trafficking; victims almost exclusively women	5
6. Handover of Study in the Bundestag 2025: Effectiveness of the Nordic Model Confirmed.....	5
Artikel 7 Answer to question 1, second sentence: Measures, that have not been addressed.....	6
Recommendation Art. 7 Question 1: Integrate expertise and perspective of survivors of Prostitution.	7
Recommendation Art. 7 Question 1: Explicit reference to women in prostitution in future reports	7
Article 11: Data collection and research Question 6	7
Article 11 Answer to question 6: ‘Sex Purchase, A Legal and Legal-Ethical Examination of Prostitution, 2023’	8
Article 11 Answer to question 6: New Study 2025 ‘Nordic Model and Human Trafficking’	8
Recommendation Art. 11 Question 6: Elaborate a General Recommendation pursuant Article 69... 10	
Article 11 Answer to question 6: Criticism from all sides: 2025 evaluation of the Prostitute Protection Act (ProstSchG)	10
Five points of criticism by the BVNM of the KFN Evaluation of the Prostitute Protection Act (ProstSchG):.....	13
1. Unsuitable methodology and possibility of third-party influence.....	13
2. Biased sample of Women in Prostitution	14
3. Subjective assessment instead of objective facts	14
4. Political bias of the evaluation	14

5. Troubling recommendations of the KFN regarding the ProstSchG	15
6. BVNM Conclusion on the Evaluation of the ProstSchG	15
Recommendation Art. 11 Question 6:	15
Article 11 Answer to question 6: Invisible- Men’s Violence Against Women in the context of Prostitution	16
Women killed in prostitution (2020–2025, Germany)	16
Very recent examples from the Federal States	19
Recommendation Article 11 Question 6:	23
Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution	23
Article 12: General obligations – Question 9.a.....	24
Article 12 Answer to question 9.a.: Germany fuels gender stereotypes: Undermines equality	24
Article 12: General obligations – Question 9.b.....	26
Article 12 Answer to question 9.b.: Germany fuels gender stereotypes: Women as commodified sex objects.....	26
Article 12: General obligations – Question 9.c.....	28
Article 12 Answer to question 9.c. Germany fuels gender stereotypes: The sexually driven man	28
Recommendations to Article 12 General obligations	30
Article 14: Education – Question 10.a.	30
Article 14 Answer to question 10.a.: Too Easy for Perpetrators – Insufficient Primary Prevention in Germany	30
Article 14 Answer to question 10.a. Normalization of boundary violations:.....	30
Recommendation to Article 14 Question 10a:	30
Final Remarks and Summary of Recommendations	30
Appendix Sexbuyer-Forums	

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

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

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

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

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

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

Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence

Artikel 7: Comprehensive and co-ordinated policies Question 1

1. Please provide information on any new policy development since the adoption of GREVIO's baseline evaluation report on your country to ensure comprehensive policies covering the areas of prevention, protection, and prosecution in relation to stalking, sexual harassment and domestic violence, including their digital dimension, rape and sexual violence, female genital mutilation, forced marriage, forced abortion and forced sterilisation, thereby demonstrating further implementation of the convention. Please specify the measures taken particularly in relation to those forms of violence against women that have not been addressed in past policies, programmes and services encompassing the four pillars of the Istanbul Convention.

Artikel 7 Answer to question 1, first sentence: Information on new policy development

The **following six passages** outline recent policy developments in Germany since the adoption of GREVIO's baseline evaluation report. The six passages illustrate ongoing debates and political initiatives aimed at strengthening the legal and societal response to prostitution.

1. CDU/CSU parliamentary group: PRO punishment of sex purchase, 2023

In November **2023**, the CDU/CSU parliamentary group in the German Bundestag took a position in favour of a sex purchase ban and the introduction of the Nordic Model in Germany.¹

2. Former Federal Chancellor Olaf Scholz, SPD: Sex purchase not acceptable, 2023

Former Federal Chancellor Olaf Scholz (SPD) stated during a government questioning session in November **2023** in the German Bundestag:²

"I do not find it acceptable when men buy women. That is something that has always morally outraged me."

He emphasized that prostitution is often linked to abuse, violence, and criminal structures.

"That is why we must do everything we can to push it back."

Prostitution must not be accepted as normality.

3. Hearing, Bundestag, Family Affairs Committee, 2024

In September **2024**, a hearing was held in the Family Affairs Committee before members of parliament from all parties. The occasion was the motion by the CDU/CSU parliamentary group:

"End degrading conditions in prostitution – punish sex purchase."

The group stated in the motion:

"Under the cloak of legality of prostitution created by the legislator, human trafficking has been able to spread unchecked. For a high six-figure number of women and girls, this means a de facto total dependency on pimps, based on emotional manipulation, deception, threats, and not least massive violence."

In the run-up to the hearing, the invited experts (women with experience in prostitution, representatives of the public prosecutor's office, support organizations, police, professional associations, etc.) submitted written statements.

The **Chief of Police of the City of Duisburg, Alexander Dierselhuis**, reported: *"We know where brothels are, but we don't have the faintest idea what is happening inside. Within the current system, we are facing a massive dark field!"*

In order to actually investigate in this highly inaccessible area, specialized police commissions would be necessary. The Chief of Police illustrated this with the estimate that around 150,000 additional officers would be required to follow up on all possible suspicions of human trafficking and pimping. Even if such units were able to secure evidence of human trafficking, many proceedings fail because the affected women often refuse to testify.

Doctoral candidate, **humanities scholar** (M.A.), author, feminist activist, blogger, former prostitute, and founder of the Ella Network, **Huschke Mau**, explained the impact of violent pornography (e.g., oral sex until vomiting, choking, and hard SM practices): *"We in prostitution are the first ones with whom sex buyers try out these practices."*

¹ Positionspapier Beschluss 7. November 2023 <https://www.cducsu.de/sites/default/files/2023-11/Positionspapier%20Sexkauf%20bestrafen.pdf>

² https://www.instagram.com/reel/CzrNH2_q5RW/

trafficking. Further information on the content of the study is addressed in this alternative report under Art. 11, Question 6.

Artikel 7 Answer to question 1, second sentence: Measures, that have not been addressed

Our interest in this question lies in highlighting not only where Germany claims progress, but more importantly where significant gaps or contradictions remain in Germany's implementation of the Istanbul Convention or in the follow-up to the list of proposals and suggestions by GREVIO from the baseline evaluation.

GREVIO Baseline Evaluation Report: Women in prostitution received attention

In its shadow report of July 2021, our predecessor organisation, Alliance Nordic Model, reported on gender-based violence in the context of prostitution.

GREVIO has taken up our concerns in its Baseline Evaluation Report on Germany (October 2022) and recognised women in prostitution as a group of women, that is confronted with particular barriers – “apart from the general issues women face” (page 14). GREVIO explicitly highlighted women in prostitution at numerous points and in its following proposals and suggestions.

Appendix I - List of proposals and suggestions by GREVIO

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

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

2. Intersectional discrimination

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

a. strengthen, on the basis of a national strategy or policy document, measures to prevent and combat violence that affects women who are or might be exposed to intersectional discrimination, including women with disabilities, women belonging to minority groups, migrant and asylum-seeking women, Roma women, LGBTI women, homeless women, elderly women, **women in prostitution** and women with addiction issues;

b. **integrate the perspective of such women** into the design, implementation, monitoring and evaluation of policies for preventing and combating violence against women, by supporting, funding and closely co-operating with women's NGOs representing them;

c. raise the awareness of victims belonging **to these groups of women** about their rights to protection and support services;

d. develop and improve accessibility to protection and support services **for these groups of women**;

e. support research into the violence experienced by specific groups of women and girls at risk of or exposed to intersectional discrimination, in particular migrant/asylum-seeking women, girls and young women, homeless women, **women in prostitution**, LGBTI women and Roma women.

VI. Investigation, prosecution, procedural law and protective measures

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

1. Reporting to, immediate response and investigations by law-enforcement agencies

52. GREVIO strongly encourages the German authorities to take the necessary measures to ensure the reporting to law-enforcement agencies of incidents of violence against women and domestic violence covered by the Istanbul Convention, in particular by (paragraph 296):

a. increasing the degree of specialisation of law-enforcement officers across the country and ensuring their sensitivity towards women and girls at the intersection of discrimination, notably migrant women, **women in prostitution**, LGBTI women and homeless women;

We would like to inform GREVIO experts with this alternative report about an exceptionally important development in Germany, where the perspective of women in prostitution was not adequately integrated in accordance with GREVIO's proposals and suggestions in I.C.2.3.b. In addition, the perspectives of survivors of prostitution were not taken into account. This concerns the evaluation of the Prostitution Protection Act (ProstSchG), which was completed in July 2025. Please refer to our remarks to Artikel 11 under the heading: '*Criticism from all sides: 2025 evaluation of the ProstSchG*'

But at this point, we would already like to highlight two recommendations:

Recommendation Art. 7 Question 1: Integrate expertise and perspective of survivors of Prostitution

In addition to GREVIO's recommendation (I.C.2.3.b), it is particularly valuable and essential to draw on the expertise of women who have exited prostitution. Unlike women currently in prostitution, survivors of prostitution can reflect on their experiences, speak openly about long-term impacts, risks, and exploitative mechanisms, without their statements being shaped by immediate survival strategies or financial dependency. This perspective therefore provides especially reliable and in-depth insights that are indispensable for developing effective measures and recommendations.

Recommendation Art. 7 Question 1: Explicit reference to women in prostitution in future reports

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

Please also refer to our remarks on Articles 12 and 14, where we highlight the contradictions between the German regulations on prostitution and GREVIO's proposals and suggestions regarding gender stereotypes and education from the baseline evaluation.

Article 11: Data collection and research Question 6

6. Please provide information on any new development since the adoption of GREVIO's baseline evaluation report on your country on the introduction of data collection categories such as type of violence, sex and age of the victim and the perpetrator, the relationship between the two and where it took place, for administrative data of relevance to the field of violence against women and domestic violence emanating from law enforcement agencies, the justice sector, social services and the public health care sector.

Article 11 Answer to question 6: ‘Sex Purchase, A Legal and Legal-Ethical Examination of Prostitution, 2023’

A study published in 2023, which concluded that German prostitution laws are not compatible with the Basic Law, examined the situation of women in prostitution in Germany.⁷ One of the authors, Prof. Dr. Elke Mack, describes in an interview with the University of Erfurt:

“Around 95 percent of women in prostitution in Germany live in circumstances where their fundamental and human rights are constantly threatened and violated. These are mostly migrants, almost all women from the poorest backgrounds, with little education and no other professional prospects. They live in conditions that endanger their health, often under coercion, and according to the authorities, they carry out their work mostly involuntarily. (...) We have consulted qualified and competent public prosecutors, police chiefs, medical professionals (especially gynaecologists), psychotherapists (trauma specialists), social workers, and affected women, and have found disturbing evidence of acute danger to the bodily integrity and lives of those affected, which was even confirmed by clients in representative client forums (pp. 206–213). Women in prostitution simply cannot withstand the daily, multiple, often violent penetration by men (up to 20 clients per day). They almost always suffer severe physical harm and, according to the studies, exhibit post-traumatic stress disorders to a high degree, comparable to torture victims and war combatants. This means that the German rule of law does not guarantee the fundamental rights of women in prostitution, because since the 2001 Prostitution Act there has been a legalised system without effective legal oversight of clients and pimps, which now serves a global market for buyers of sex. Even after the introduction of the Prostitute Protection Act in 2017, our results show that this has substantially not changed.”

Article 11 Answer to question 6: New Study 2025 ‘Nordic Model and Human Trafficking’

The study by Dr. Jakob Drobnik, ‘Nordic Model and Human Trafficking’⁸ from 2025 analyses the impact of the varying implementations of the Nordic Model in Sweden, France, and Norway. It focuses on the central question of how effective the Nordic Model is in combating human trafficking for the purpose of sexual exploitation. Particular emphasis is placed on prosecution practices, inter-agency cooperation, victim protection, and preventive measures.

Key findings:

- **Reduction in human trafficking:** In Sweden, Norway, and France, human trafficking and the number of victims have demonstrably decreased.
- **Lower profits for organized crime:** Criminal networks lose market share as demand declines.
- **Societal acceptance:** Broad support exists for the sex purchase ban (Sweden 72%, Norway 65%, France 78%).
- **Cultural shift:** Sexbuyers are increasingly seen as complicit in exploitation, while women are recognized as victims of coercion and hardship.
- **Destigmatization:** Women in Prostitution face less stigma and are more widely recognized as affected individuals.

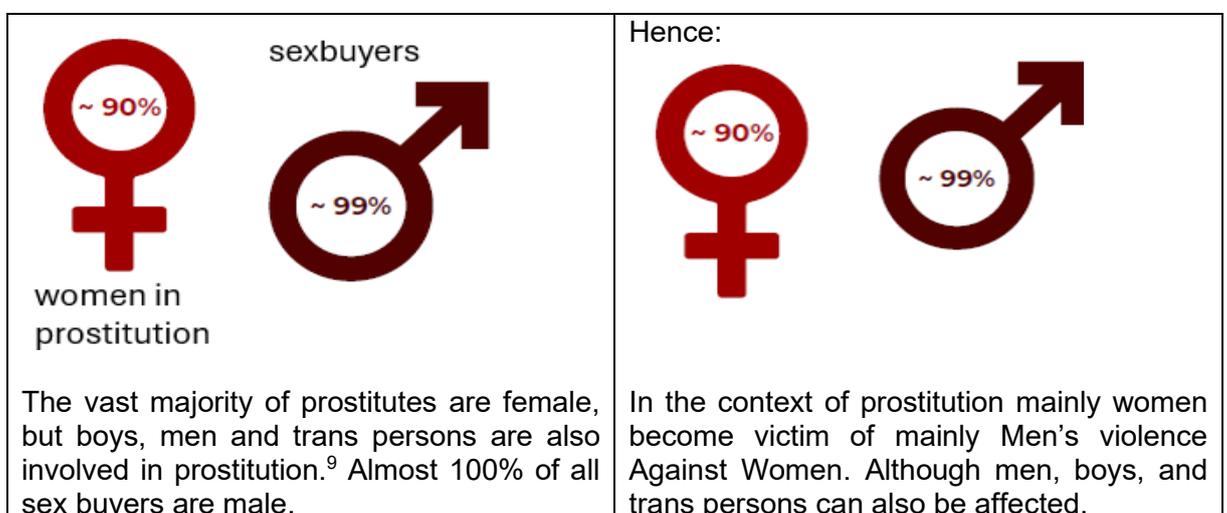
⁷ Prof. Dr. Elke Mack, Prof. Dr. Ulrich Rommelfanger, Sexkauf, Eine rechtliche und rechtsethische Untersuchung der Prostitution, 2023 <https://www.nomos-shop.de/de/p/sexkauf-gr-978-3-8487-7597-2>

⁸ Nordic Model and Human Trafficking – Data-Based Analysis of the Legal and Ethical Implications of the Nordic Models in Sweden, Norway, and France” Jakob Drobnik, 2025 https://www.db-thueringen.de/receive/dbt_mods_00066057

- **Strengthening of exit programs:** In France, 95% of participants in state-supported programs successfully exited prostitution.
- **Decline in prostitution:** Quantitative reductions are significant—Sweden 72–77%, Norway 45–60%, France up to 35%.
- **More victims identified:** Sweden saw a 5- to 7-fold increase in identification rates; in France +49% (2016–2023), in Norway –44% registered victims.
- **Increased willingness to report and cooperate:** Victims are more likely to cooperate with authorities; in France, reporting rates by trafficking victims rose from 18% to 36%.
- **Easier investigative work:** Authorities can monitor online contacts; pimping is easier to prosecute than human trafficking.
- **Strengthened victims' rights:** Women are decriminalized and receive greater protection (e.g., residence permits, social benefits).
- **Societal awareness:** Awareness of the violent and exploitative nature of prostitution is increasing.
- **Conclusion:** The sex purchase ban under the Nordic Model is proportionate, systemically coherent, and sustainable; success requires an integrated approach (law enforcement, prevention, social support).
- **Long-term recommendation:** Effective combatting of human trafficking is only possible through EU-wide adoption of the Nordic Model.

The results demonstrate that the Nordic Model not only contributes to the reduction of violence but also represents a coherent, ethically grounded, and effective long-term strategy to protect women from violence in the context of prostitution.

The Nordic Model and the Istanbul Convention pursue the same approach regarding the protection and support of victims, prevention, awareness-raising, education, and the combat of sexual violence, which is why elements of the model, as well as the violence experienced by women in the context of prostitution, could have been well integrated into the text of the Convention.



⁹ Bundesministerium für Familie Senioren Frauen und Jugend
<https://www.bmfsfj.de/bmfsfj/themen/gleichstellung/frauen-vor-gewalt-schuetzen/prostituiertenschutzgesetz/gesetzliche-regelungen-80646>

Although the Istanbul Convention represents the most comprehensive international legal instrument for the protection of women from violence, prostitution has not been explicitly included as a form of gender-based violence. According to feedback we¹⁰ received in the course of our participation in the baseline evaluation, this was mainly due to the fact that the state parties were unable to reach agreement on this point during the drafting of the Convention. This is fatal, because the member states are well aware that the number of unreported cases of sexual exploitation in the context of prostitution is estimated to be very high, and they also know that prostitution cannot be viewed in isolation: while certain countries are predominantly destination states for sexual exploitation, others are primarily countries of origin of the affected women. Effective cross-border prevention and awareness-raising programs that place a general focus on demand are lacking a General Recommendation pursuant Article 69. The structural interconnections, as well as the omnipresent violence that women experience from men in the context of prostitution, resemble a “pink elephant in the room” – obvious, yet insufficiently addressed so far.

It is precisely here that Article 69 of the Istanbul Convention offers an important starting point. The official explanations make it clear that GREVIO, through general recommendations, can create a common interpretive framework for all state parties. Article 69 is modelled on Article 21(1) CEDAW.¹¹ That such an interpretation is possible is demonstrated by CEDAW itself: in its General Recommendation No. 38 (2020) on ‘Trafficking in women and girls in the context of global migration,’ the demand that fosters exploitation of prostitution and leads to trafficking in persons is explicitly addressed as a problem.¹²

In its General Recommendation No. 38 CEDAW Experts recommend 2020:¹³

61. Discourage the demand that fosters exploitation of prostitution and leads to trafficking in persons.’

Since general recommendations are not legally binding, they constitute a central instrument for GREVIO to address the serious gap in the Istanbul Convention regarding violence by men against women in the context of prostitution. At the same time, a General Recommendation pursuant to Article 69 can serve as an important reference for the state parties, providing a deeper understanding of the root causes of men’s violence against women in the context of prostitution and can offer guidance that can contribute to the effective implementation of its provisions.

Recommendation Art. 11 Question 6: Elaborate a General Recommendation pursuant Article 69

GREVIO is encouraged to consider elaborating a General Recommendation under Article 69, recommending that States adopt measures for the prevention of gender-based violence in the context of prostitution.

Article 11 Answer to question 6: Criticism from all sides: 2025 evaluation of the Prostitute Protection Act (ProstSchG)

In June 2025, the Criminological Research Institute of Lower Saxony (KFN) presented its evaluation of the Prostitute Protection Act (ProstSchG) to the Ministry for Family Affairs.¹⁴

¹⁰ ‘We’ means our predecessor organisation, Alliance Nordic Model

¹¹ Explanatory report to Art 69 of the Convention, no. 359, first sentence

¹² Part IV C ‘Demand that fosters exploitation and leads to trafficking’, page 7

<https://www.undocs.org/en/CEDAW/C/GC/38>

¹³ Part VII Recommendations, A3. ‘Demand that fosters exploitation and leads to trafficking’ Page 14

<https://www.undocs.org/en/CEDAW/C/GC/38>

¹⁴ Abschlussbericht

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

The KFN carried out the evaluation between 1 July 2022 and 1 April 2025 in cooperation with three subcontractors.¹⁵

The evaluation aimed to examine the impact and effectiveness of the Prostitute Protection Act (ProstSchG). According to its own account, the KFN conducted a retrospective regulatory impact assessment. This means that the consequences of a law are analysed retrospectively and the achievement of its objectives reviewed. For this purpose, the KFN identified overarching, main and sub-objectives of the ProstSchG. The acceptance and practicability of the registration and licensing procedure, as well as the monitoring procedure, were assessed. The degree to which the law's objectives were achieved was examined with regard to strengthening and protecting sexual self-determination, safeguarding health, and ensuring contractual working conditions. In addition, unintended side effects were investigated. The KFN evaluation has received much criticism.

1. Network Ella:¹⁶

Even here, we as survivors of prostitution, were not consulted, although it is precisely we who, with the distance that is often needed and the processing we ourselves undertake, could have contributed so much to understanding the circumstances in prostitution. Instead, we were simply ignored. (...) According to the evaluation, 27% of prostituted women have a university degree. During my time in prostitution, I did not meet a single woman with a university degree, no matter where I was."

3. Solwodi Germany- A Missed Opportunity: The Evaluation of the Prostitute Protection Act ¹⁷

"The KFN evaluation is based on methodologically induced biases and questionable approaches, and consequently presents an overly positive picture of prostitution and the effectiveness of the law."

4. Municipal Women's Office of the City of Wiesbaden:¹⁸

"The distribution of the questionnaires through business operators and also through self-representation organisations, whose members often act in a dual role as both women in prostitution and, for example, studio operators with their own income from prostitution, continued to allow political influence on the responses to the questionnaires."

¹⁵ Die Evaluation besteht aus einem Abschlussbericht und zwei Gutachten (Begleitgutachten zu „Freiwilligkeit in der Prostitution“ und Begleitgutachten zum „Prostituiertenschutzgesetz und Baurecht“)

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

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

¹⁶ https://www.buendnisludwigsburg.de/media/marlene_netzwerk_ella_statement_und_erfahrungen.pdf

<https://netzwerk-ella.de/>

¹⁷

https://daten2.verwaltungsportal.de/dateien/seitengenerator/0832ea4e327556b1629db18c84df6f0f186819/SOLWODI_Aktuell_Nr_175.pdf

¹⁸ https://www.bundesverband-nordischesmodell.de/wp-content/uploads/go-x/u/a25184df-7c52-4f17-b580-5afc15f6813e/KFN_Evaluation_PDF_Version_komprimiert_Stadt-Wiesbaden.pdf

5. Zeromacho:¹⁹

“Statements such as

‘A concept of sexuality that is exclusively aimed at mutual sexual gratification, however, seems highly unrealistic. Apart from that, the commercialisation of sexuality is widespread,’

leave one shocked and bewildered, as they have no place in a scientific study, but they do reveal the background against which this study was conducted. Happiness is described as unrealistic, and the current state (the commercialisation) is used to justify the status quo.”

6. German Institute for Applied Criminal Research, DIAKA e.V.:²⁰

“When the authors (on p. 581) almost defiantly claim:

‘The results, in any case, refer to the surveyed groups...’

they presumably mean the group of escort service providers, dominatrices, brothel and massage salon operators, etc., which is precisely not representative of the entirety of Women in prostitution.”

7. Freedom for Women:²¹

“I myself participated in the online survey. And I can assure you: No woman who is not voluntarily in prostitution will openly write in such a survey that she was forced into prostitution. Out of fear. Out of shame. Out of concern that there will be consequences – even when participating supposedly anonymously.”

8. Alliance Against Human Trafficking and Forced Prostitution, Ludwigsburg:²²

“The evaluation presented may now form the basis for further political decisions, even though it exhibits serious methodological flaws and paints a distorted picture of reality.”

9. Action Group for Gender Equality Bavaria, AGGB:²³

“We have a comprehensive, very systematically compiled collection of material, containing findings that are sometimes more, sometimes less relevant and valid for the everyday practice of counselling centres, but from which no consistent guidance for policy can be derived – and from which no sustainable protection against sexual exploitation can be expected.”

¹⁹ Zusammenfassung: https://zeromacho.de/wp-content/uploads/2025/08/2025.07.29_Zusam.fassg_Stellungnahme-zur-Evaluation_V2.0_Final.pdf

Ganze Stellungnahme: https://zeromacho.de/wp-content/uploads/2025/08/2025.07.29_Stellungnahme-zur-Evaluation_V7.0_Final.pdf

²⁰

https://www.diaka.org/app/download/16830605122/Stellungnahme_Evaluation+ProstSchG_DIAKA.pdf?t=1757008071

https://freiheitfuerfrauen.de/blog/?fbclid=IwdGRjcAMexoFjbGNrAx7GcGV4dG4DYWVtAjExAAEeWVyCrtW4E3a0aXI4NLEvmnrZU8W3xdnBz9JKiSU8pow5rsulrL0XTtOBuDk_aem_WMCfnlzD3GmOuFWWmCgXaA

²² https://www.buendnisludwigsburg.de/media/zusammenfassung_das_ganze_feld_28_07_2025.pdf

²³ <https://www.aggbayern.de/wp-content/uploads/go-x/u/35ee8daa-0521-4602-8218-9593a76df2d0/KFN-Evaluation-kritisch-betrachtet-30.07.2025-Ue-11.08.2025-1.pdf>

10. Together Against Human Trafficking:²⁴

“We are, however, very critical of the recommendation to examine whether the application of the ProstSchG should also be extended to minors.” This, they argue, is a ‘confession of failure’, because prostitution involving minors is illegal. The statement gives the impression that minor prostitution is simply to be tolerated and normalised. The term ‘minor prostitutes’ runs throughout the entire evaluation.

11. TERRE DES FEMMES:²⁵

“It is not enough to make minor adjustments to the Prostitute Protection Act – we need a sex purchase ban as a lever against violence, exploitation and inequality.”

12. Coalition against Trafficking in Women (CATW):²⁶

“The authors should have instead undertaken sound, trauma-informed, and in-person interviews with respondents in prostitution who are representative of the current German sex trade population. The authors gloss over the fact that the overwhelming majority of prostituted individuals are migrant women, whose vulnerabilities to violence and sexual exploitation are acute. Furthermore, the Evaluation relies on data and anecdotes from individuals and groups – such as brothel owners, sex buyers, and organizations that lobby for the legalization of prostitution – with strong personal and financial investments in the protection and growth of the sex trade.”

Five points of criticism by the BVNM of the KFN Evaluation of the Prostitute Protection Act (ProstSchG):²⁷

1. Unsuitable methodology and possibility of third-party influence

- The chosen method of an online survey via a sent link is not suitable for reaching people in prostitution
- In an online survey, it cannot be verified who actually completed the questionnaire.
- Response rates of over 80% in some cases are questionable, especially since women in prostitution are a hard-to-reach target group. Such high response rates suggest the survey may have been influenced by third parties.
- 42.5% of all online questionnaires received from people in prostitution were distributed via prostitution platforms and businesses – i.e., through beneficiaries of prostitution. It is known that most accounts on prostitution platforms are not operated by the women in prostitution themselves, but by pimps and other profiteers.

²⁴ <https://www.pro-medienmagazin.de/heftige-kritik-an-auswertung-von-prostituiertenschutzgesetz/>

²⁵ <https://frauenrechte.de/aktuelles/detail/pm-zur-evaluation-des-prostituiertenschutzgesetzes-wir-brauchen-ein-sexkaufverbot-als-hebel-gegen-gewalt>

²⁶ <https://catwinternational.org/2025/08/catws-statement-on-the-evaluation-of-germanys-2017-prostitutes-protection-act/>

²⁷ Ausführliche Stellungnahme des BVNM zur Evaluation:

https://www.bundesverband-nordischesmodell.de/wp-content/uploads/go-x/u/f81a4c3a-7df7-4c4c-9a02-4d3dde3cb4b0/Kommentar-BVNM_Evaluation-ProstSchG_Langfassung_1.pdf

2. Biased sample of Women in Prostitution

- The sample of women in prostitution is neither representative nor meaningful, but heavily biased. This is also reflected in the response behaviour: for example, 49.3% of the surveyed women in prostitution stated that they entered prostitution for self-fulfilment. Only 3.5% said they felt forced into it.
- The bias in the sample could have been detected by comparing it with official statistics, police data, and counselling centre figures. For example: 44.6% of women in prostitution in the KFN sample hold German nationality. According to federal statistics, however, 82.6% of registered women in prostitution in 2024 (official "light field") were foreign nationals. According to the KFN sample, 83.8% of women in prostitution have health insurance. In practice, however, most women in prostitution do not have health insurance.

3. Subjective assessment instead of objective facts

- The KFN primarily evaluates the practice and goal achievement of the ProstSchG based on the subjective assessments of groups personally involved in prostitution or even benefiting from the prostitution of others (clients, operators of prostitution venues, women in prostitution).
- No assessment was made using objective criteria, even though this would have been necessary to contextualise the results. For example, the survey asks about the subjective sense of safety of women in prostitution in various situations. The result: the sense of safety among women in prostitution is reported as medium to high. Had safety been measured using objective criteria (e.g., murders of women in prostitution), a completely different assessment of their safety would have emerged. Prostitution is a (life-) threatening activity!
- The online survey gave profiteers of prostitution (clients, operators of prostitution venues) considerable influence in "shaping" the evaluation. Not only the data, but also the KFN's resulting recommendations to legislators are therefore biased by interest. The KFN fails to critically reflect on this. Statements from profiteers are given equal weight to those from women in prostitution. Das KFN überprüft die Praxis und den Zielerreichungsgrad des ProstSchG primär entlang der subjektiv abgefragten Einschätzung von Gruppen, die persönlich in die Prostitution involviert sind oder sogar von der Prostitution anderer profitieren (Freier, Betreiber von Prostitutionsstätten, Prostituierte).

4. Political bias of the evaluation

- The KFN clearly exceeds its actual evaluation mandate! The KFN assesses other legal models, such as the sex purchase ban. According to the KFN, its introduction is not necessary because prostitution does not violate human dignity or sexual self-determination. However, the legislator's research mandate was to examine the effects of the ProstSchG! The assessment of other legal models therefore appears to be politically motivated on the part of the study authors.
- In the introduction to the evaluation, the KFN critiques prostitution-critical arguments and authors in order to justify prostitution and the sex purchase. This reveals the political bias of the study authors. It is not a neutral, balanced, and scientifically detached research approach.
- Even the introduction to the evaluation makes it clear that the study is blind to gender. The structural gender asymmetry in prostitution (women in prostitution are mostly female, demand is predominantly male) is not even mentioned. Not even at the point where the KFN argues that prostitution does not violate the principle of equality between men and women.

5. Troubling recommendations of the KFN regarding the ProstSchG

- The KFN's recommendations to legislators should be treated with caution due to the methodological flaws of the study. The recommendations primarily reflect the interests of profiteers of prostitution.
- Overall, the KFN's recommendations point towards a further liberalisation of prostitution legislation (e.g., easing the licensing procedure for prostitution venues, removing the requirement to separate sleeping and 'work' areas for women in prostitution, extending the scope of application (§ 1 ProstSchG) to "minor women in prostitution," etc.).
- The recommended measures are cosmetic and will not improve the living conditions of women in prostitution. Instead, the recommendations strengthen the profiteers of prostitution. Die Empfehlungen des KFNs an den Gesetzgeber sind durch die methodischen Mängel der Studie mit Vorsicht zu genießen. In den Empfehlungen spiegeln sich vor allem die Interessen der Profiteure der Prostitution wider.

6. BVNM Conclusion on the Evaluation of the ProstSchG

The evaluation is not meaningful due to serious methodological flaws, obvious bias in the sample of women in prostitution, and the political bias of the study authors. The evaluation could neither provide reliable results on the impact of the ProstSchG nor shed more light on the living conditions of women in prostitution. On the contrary, the most vulnerable women in prostitution—those the ProstSchG was actually intended to protect—are not represented in the KFN evaluation, even though counselling centres had drawn the KFN's attention to this issue during the evaluation process. Instead, profiteers of prostitution were given considerable space in the evaluation to include their "assessments" of the ProstSchG.

In 2002, the Prostitution Act (ProstG) marked the first attempt to improve the living conditions of women in prostitution. The evaluation of this law showed that the intended goal was not achieved. In 2017, the Prostitute Protection Act (ProstSchG) represented a second attempt to improve the situation of women in prostitution. This law has also brought no noticeable improvement—even though the KFN evaluation sees "potential" in the ProstSchG. However, as described, the evaluation has significant flaws and is therefore of limited reliability. Over the past 23 years, profiteers of prostitution have significantly strengthened their position. The purchase of sex has become normalised. Germany has become a destination for human trafficking and sex tourism. Prostitution is not a sexual service but a form of violence against women. It cannot be effectively regulated or managed. Instead, a multidimensional approach is needed, combining social support for women in prostitution, prevention and education, and criminal law measures. Any renewed reform of prostitution legislation must take new approaches.

It is appropriate for an expert commission to address the results of the evaluation and its shortcomings. Nevertheless, time continues to pass in which thousands of women in prostitution experience violence. Time during which clients and pimps continue to perpetrate violence against these women under the guise of legality. Therefore, this time should not only be spent on review but also on developing concrete solutions that lead to real improvements. With the Nordic Model, concrete proposals for solutions are already on the table.

Recommendation Art. 11 Question 6:

In line with the coalition agreement between the CDU/CSU and SPD, the Ministry for Family Affairs is currently assembling a commission of independent experts, which will then develop the necessary adjustments to the Prostitute Protection Act.

The BVNM urges GREVIO to carefully examine the KFN evaluation of the Prostitute Protection Act (ProstSchG). Key points for attention:

1. Methodological flaws and bias: Ask critical questions about the study's methodology, sample, and the political bias of its authors.
2. Representation of vulnerable women and survivors of prostitution: Ensure that the perspectives of the most vulnerable women in prostitution and survivors of prostitution are adequately considered.
3. Validity of conclusions: Critically assess any claims regarding the effectiveness of the ProstSchG, given the evaluation's limited reliability.
4. Observe the composition of the commission.
5. Encourage German authorities to implement practical measures that improve protection and support for women in prostitution, including exploring approaches such as the Nordic Model.

This focus will help GREVIO ensure that its evaluation reflects the real conditions and challenges faced by women in prostitution in Germany.

Article 11 Answer to question 6: Invisible- Men's Violence Against Women in the context of Prostitution

In its Baseline Evaluation, GREVIO emphasizes that women in prostitution belong to those groups of women who face particular barriers. These include, among others, women with disabilities, migrant and asylum-seeking women, girls and young women, homeless women, victims of forced marriage, women in prostitution, women with addiction problems, Roma women, and LGBTI women.²⁸

Certain groups are indeed statistically recorded in Germany – for example, women with disabilities, homeless women, and women with addiction problems under the category *victims due to personal impairment (T941)*²⁹ Girls, young women, and victims of forced marriage are included in *Total victims by age and sex – extended age groups (T91)*.³⁰ Crimes against migrant and asylum-seeking women are reported in the federal situation report in the context of migration³¹, while crimes against LGBTI persons are documented in the status report on crime-related safety of LGBTIQ*.³²

However, the German system shows significant gaps: violence against women in the context of prostitution as well as against Roma women is not officially recorded. As a result, precisely those groups who, according to GREVIO, are exposed to particular risks remain invisible. Germany therefore faces a serious deficit in the systematic documentation and analysis of gender-based violence, which hinders both effective prevention and adequate support for these especially vulnerable women.

Women killed in prostitution (2020–2025, Germany)

Media-reported cases of prostitutes who were killed between 2020 and 2025 represent only the tip of the iceberg of violence against women in the context of prostitution. These documented killings underscore that

²⁸ Baseline Evaluation, GREVIO, e.g. page 14, No. 16, 17

²⁹ https://www.bka.de/SharedDocs/Downloads/DE/Publikationen/PolizeilicheKriminalstatistik/2024/Bund/Opfer/BU-O-14-T941-Beeinträchtigung_xls.xlsx?__blob=publicationFile&v=2

³⁰ https://www.bka.de/SharedDocs/Downloads/DE/Publikationen/PolizeilicheKriminalstatistik/2024/Bund/Opfer/BU-O-02-T91-Alter-erw_xls.xlsx?__blob=publicationFile&v=2

³¹

https://www.bka.de/SharedDocs/Downloads/DE/Publikationen/JahresberichteUndLagebilder/KriminalitaetImKontextVonZuwanderung/KriminalitaetImKontextVonZuwanderung_2023.pdf?__blob=publicationFile&v=4

³² https://www.bmi.bund.de/SharedDocs/downloads/DE/publikationen/themen/sicherheit/BMI24043-Ib-lsbtiq.pdf?__blob=publicationFile&v=2

such violence is not merely a series of isolated incidents, but a structural and severe problem that extends far beyond these tragic individual cases.

1

On 3 September 2025, a 52-year-old Vietnamese woman, who was reported to have been involved in prostitution, was found dead in a residential brothel in **Berlin**.³³ The police suspect a homicide. The perpetrator has not yet been caught.

2

In April 2023, a Thai boxer killed a woman involved in prostitution in a residential brothel in **Berlin**.³⁴ The Public Prosecutor's Office stated that the perpetrator "*was, among other things, acting as an intermediary for prostitution services for the later deceased...*". (In Germany, not all forms of pimping are illegal, so authorities, such as the Berlin Public Prosecutor's Office in this case, refer to it as "intermediary activity".)

In the apartment, the Thai boxer first rendered the woman unconscious with a chin hook. When she regained consciousness and tried to resist, he kicked and struck her again. He left her severely injured. The woman had suffered massive internal bleeding and ultimately died from circulatory collapse.

3

At the end of 2023, a Bulgarian woman subjected to forced prostitution was tortured to death in **Koblenz**. The two Bulgarian perpetrators had advertised the victim as a prostitute via online platforms and forced her, through violence and humiliation, to have sex with others. The accused had been active in the red-light district for many years. According to the indictment, they had treated their victim like a "slave." They reportedly had known the woman for more than ten years.

For the 31-year-old, life was marked by torture and pain. At the time of her death, she reportedly had more than 30 untreated bone fractures. The presiding judge stated at the verdict that they had dehumanised their victim and made no genuine attempt to save her.³⁵

4

At the beginning of 2022, a woman involved in prostitution was killed by a client in a car park in **Hamburg**.³⁶ He had contacted the 35-year-old via the internet and arranged sexual acts in exchange for payment. In the car, an argument broke out between them. The German man grabbed the woman by the throat with both hands and covered her mouth. She suffocated due to lack of oxygen. Afterwards, the 32-year-old left her naked body in a forest.

³³ <https://www.bild.de/regional/berlin/mord-im-bordell-prostituierte-getoetet-taeter-auf-der-flucht-68b97f7ee741757b51ad7abd>

<https://www.sueddeutsche.de/panorama/kriminalitaet-tote-frau-in-wilmersdorf-hintergruende-unklar-dpa.urn-newsml-dpa-com-20090101-250904-930-995058>

³⁴ https://rp-online.de/panorama/deutschland/toetung-von-prostituierter-in-berlin-haftstrafe-fuer-angeklagten_aid-113093623

<https://www.berlin.de/generalstaatsanwaltschaft/presse/pressemitteilungen/2023/pressemitteilung.1392072.php>

³⁵ <https://www.zeit.de/news/2024-05/13/prozess-um-zwangsprostitution-und-mord-beginnt>

https://youtu.be/mdYb_L-sQpA?si=waUrpR_KKHgoOjJE&t=50 in der SWR Landesschau Rheinland-Pfalz vom 07.07.2025

<https://www.swr.de/swraktuell/rheinland-pfalz/koblenz/prostituierte-koblenz-getoetet-prozess-beginn-landgericht-100.html>

³⁶ https://www.spiegel.de/panorama/justiz/winsen-landkreis-harburg-prostituierte-erwuergt-neun-jahre-haft-fuer-32-jaehrigen-a-c1c67d1a-61cd-4285-9d43-938aa84ffe82?utm_source=chatgpt.com

5

In October 2022, a client killed a woman involved in prostitution in **Offenbach**.³⁷ He first beat the woman, then injured her with a knife, and finally strangled her. He hid the body in 25 rubbish bags behind a wall in his apartment. The verdict emphasised that the perpetrator had treated the woman as an object.

6

Luca V., a 25-year-old Hungarian woman involved in prostitution, was killed in November 2022 by her partner in a hotel in **Munich**. He brutally assaulted her with kicks and ultimately strangled her. He then poured petrol over her body, set it on fire, and buried it at Lake Starnberg.³⁸

7

In 2021, two men killed Silke B., a 53-year-old woman in a residential brothel in **Hanover**.³⁹ They attacked and strangled the woman, causing severe head and neck injuries. Afterwards, they tied and gagged her. She suffocated.

8

In 2021, a 53-year-old woman involved in prostitution was found dead in a brothel in **Essen**.⁴⁰ Investigators ruled out third-party involvement. A homicide was not suspected. The woman had acted as a dominatrix.

9

In 2020, a woman subjected to forced prostitution was strangled, killed, and thrown into the Weser River with a concrete block attached to her foot in the **Nienburg** district.⁴¹

10

In **Kiel**, two women involved in prostitution were murdered in 2018 and 2020.⁴² The sexbuyer abused and bound them. He ultimately killed them by placing a plastic bag over their heads.

³⁷ <https://www.faz.net/aktuell/rhein-main/lebenslange-haft-nach-mord-an-prostituiertes-in-offenbach-19772871.html>
<https://www.n-tv.de/regionales/hessen/Mann-soll-Prostituierte-erwuergt-haben-Prozess-startet-article24751058.html>

³⁸ <https://radio-oberland.de/news/2024-04-30-urteil-prostituierten-mord>
<https://www.ovb-heimatzeitungen.de/bayern/2024/01/23/verscharrt-am-starnberger-see.ovb>

³⁹ <https://www.haz.de/lokales/hannover/getoetete-sexarbeiterin-in-hannover-stoecken-zwoelf-jahre-haft-fuer-die-taeter-NFFYVXYWGI3U657RMGOCXDHEW4.html>
https://www.bild.de/regional/hannover/hannover-aktuell/silke-b-erstickte-qualvoll-12-jahre-haft-fuer-prostituierten-killer-80101466.bild.html?utm_source=chatgpt.com https://www.tag24.de/justiz/mord/prostituierte-fuer-950-euro-getoetet-angeklagte-schweigen-zu-mord-2379980?utm_source=chatgpt.com

⁴⁰ https://www.t-online.de/region/essen/id_90432014/tote-prostituierte-in-essen-gefunden-kein-hinweis-auf-fremdeinwirkung.html
<https://www.derwesten.de/staedte/essen/essen-leiche-rotlichtviertel-tot-prostituierte-polizei-todesursache-bordell-frauenleiche-id109855.html>

⁴¹ <https://www.bundesgerichtshof.de/SharedDocs/Pressemitteilungen/DE/2023/2023082.html>
<https://www.ndr.de/nachrichten/niedersachsen/Frau-getoetet-und-in-Weser-versenkt-Gericht-senkt-Haftstrafen,weser332.html>

⁴² <https://www.spiegel.de/panorama/justiz/rendsburger-frauenmoerder-zu-lebenslanger-haft-verurteilt-a-57452e2a-2675-446a-b4a2-646d4b11a0ab>

Very recent examples from the Federal States

Weekly, the media report on Men's Violence against Women in the context of prostitution. The most recent reports and information are listed below.

Bavaria

In December 2024, Bavaria's Minister for Social Affairs, Ulrike Scharf, emphasised:

"Women in prostitution are particularly at risk of sexual exploitation, forced prostitution, and human trafficking. (...)"⁴³

Demand at fairs, trade shows, and events is being fuelled:

Mass events such as the Oktoberfest or the construction machinery trade fair in Munich lead to a significant increase in the demand for prostitution. Numerous women from other countries are brought to Germany on such occasions to provide sexual services for payment. Brothel operators report that they could not remain in business without the income generated during the Oktoberfest.⁴⁴ Taxi and rickshaw drivers are paid commissions of up to 50 euros for each client they bring.⁴⁵

This phenomenon affects large-scale events throughout Germany. Sexual acts for payment are marketed and advertised in the same way as commercial products. Seasonal and event-related marketing strategies for sexual services follow the same mechanisms as advertising for consumer goods — for example, during Christmas, carnival, Easter, or major football events.⁴⁶

Regensburg 2023: Numerous violence experts reported in November 2023 at the annual conference "*Human Trafficking and Trauma – Challenges in Combating Trafficking of Women*" in Regensburg:

Rodica Knab, trauma therapist and staff member at the SOLWODI Augsburg specialist counselling centre, pointed out that most women in prostitution come from collectivist societies, where the reality of women's lives is generally shaped by physical and psychological violence and degradation. Dependence on violent men is part of everyday life, and therefore a sense of victimhood is often absent.⁴⁷

Cathrin Schauer-Kelpin, the managing director of the association KARO e.V., reported on the risk of secondary traumatisation among helpers—a topic that has so far received little public attention. She emphasised that in counselling and support work, one's own worldview is repeatedly shaken. Many committed professionals develop symptoms of burnout over time: exhaustion, loss of motivation, cynicism, irritability, doubts about their own competence, as well as feelings of helplessness and hopelessness.

Secondary traumatisation refers to the transmission of a traumatic experience without being directly affected oneself. The mere knowledge of the traumatic event evokes strong empathy and can eventually lead to an

⁴³ <https://www.stmas.bayern.de/aktuelle-meldungen/pm2412-316.php>

⁴⁴ <https://www.stern.de/panorama/oktoberfest--wie-viel-verdient-man-mit-sexarbeit-auf-den-wiesn--36030886.html>

⁴⁵ <https://www.wiwo.de/unternehmen/dienstleister/rikscha-fahrer-waehrend-des-oktoberfests-ist-muenchen-das-groesste-bordell-europas/30021860.html>

<https://open.spotify.com/episode/OiQnFfi5YfjAXjHcqJmoCE?si=BPB2nhHaQoi0YxmFMLnfqw>

⁴⁶ <https://www.bundesverband-nordischesmodell.de/arbeitsbereiche/pm-06-2024-anstieg-der-prostitution-wegen-em/>
<https://www.sueddeutsche.de/leben/sexarbeit-em-spielorte-rechnen-mit-deutlich-mehr-prostitution-dpa.urn-newsml-dpa-com-20090101-240615-99-404922>

⁴⁷ <https://www.hss.de/news/detail/frauenhandel-und-trauma-news10590/>

unconscious identification, resulting in the helper experiencing the same symptoms as those seen in post-traumatic stress disorder (PTSD).⁴⁸

Lower Saxony

In 2025, there are 66 mobile homes in Lower Saxony for the purpose of prostitution. Many women come from other countries.⁴⁹

In 2025, 15 brothels were raided in Hanover: A married couple is alleged to have failed to register 72 people in prostitution and employees, evaded social security contributions, and apparently controlled them under threats of violence.⁵⁰

Baden-Württemberg

On 12 June 2024, the Social Committee of Baden-Württemberg reported on the development of violence against women in prostitution:⁵¹

- The number of crimes against women in prostitution increased by 25.2% compared with the previous year (155 cases), rising to 194 cases—a new record high.
- Majority of cases: offences involving assault and crimes against personal freedom (156 cases). Assault offences are violent crimes characterised by particular ruthlessness, brutality, or aggression.
- More than a quarter (27.8%) of the offences were bodily harm offences.
- Most common locations: Stuttgart (63 cases), Heilbronn (26 cases), and Karlsruhe (14 cases).
- Human trafficking and forced prostitution remain at single-digit to low double-digit levels.
- Since the introduction of the Prostitute Protection Act, the police crime statistics show a clear increase in cases of violence.
- In the past three years, not a single violent crime against male prostitutes has been recorded.

North Rhine-Westphalia

Between late 2022 and spring 2025, victims aged 15 to 25, including minors, were allegedly forced into prostitution through threats and violence. Some were made to serve multiple clients daily, and one young woman was reportedly coerced into an abortion and forced to continue working shortly after.⁵²

The State Criminal Police Office of North Rhine-Westphalia describes in its 2023 human trafficking report:⁵³

"A 24-year-old student from Hungary intended to take a temporary job in Germany during the semester break. She used the contact of an acquaintance from North Rhine-Westphalia and traveled to him.

⁴⁸ <https://www.hss.de/news/detail/frauenhandel-und-trauma-news10590/>

⁴⁹ <https://www.zeit.de/news/2025-08/26/medienbericht-66-lovemobile-in-niedersachsen>

⁵⁰ https://www.ndr.de/nachrichten/niedersachsen/hannover_weser-leinegebiet/Zuhaelter-in-Hannover-im-Visier-Razzien-in-mehreren-Bordellen,aktuellhannover18666.html

⁵¹ <https://www.zeit.de/news/2024-05/10/gewalt-gegen-prostituierte-im-suedwesten-nimmt-zu>
<https://www.landtag-bw.de/de/aktuelles/pressemitteilungen/sozialausschuss-thematisiert-prostitution-in-baden-wuerttemberg-419734>

⁵² 6th October 2025: <https://ms-aktuell.de/aktuelles/zwangsprostitution-in-muenster-prozess-gegen-mutmassliches-zuhaelter-trio-gestartet/>

⁵³ Seite 16 Ziffer 2.1.4. https://polizei.nrw/sites/default/files/2024-12/241216_lb-menschenhandel-ausbeutung-2023.pdf

She assumed that she would be employed as a cleaner. In reality, however, she fell into the hands of a 36-year-old Sri Lankan pimp, who forced her into prostitution through the use of violence. The perpetrator took her passport and attempted, against her will, to produce explicit videos with her."

Brandenburg

In September 2025, women from Brazil are alleged to have been forced into prostitution by seven suspects. The accused are said to have placed ads on a dating platform, coordinated appointments, and rented apartments. Weapons were seized.⁵⁴

Hesse

August 2025⁵⁵: The predominantly Chinese suspects are alleged to have smuggled women illegally into Germany and forced them into prostitution in illegal short-term rental apartments. The victims were exploited sexually through online platforms and call centers, with violence and coercion in the background.

Illegal Prostitution is not an Isolated case in Hesse.

Rhineland-Palatinate

Juli 2025⁵⁶: In Landau and Frankenthal, massage studios were raided because minors were allegedly forced into prostitution there. The victims, often from abroad, are pushed into illegal prostitution through violence, coercion, and manipulation, for example via the "Lover Boy" method. Massage studios provide perpetrators with ideal conditions for exploitation due to their privacy and infrastructure.

Neuwied 2025:⁵⁷ Feedback from practice shows that the proportion of women acting voluntarily and without violence is vanishingly small. Registration often takes place under the control of brothel operators – voluntary participation is rarely the case.



Saxony

Chemnitz März 2025 'Illegal prostitution in her apartment. The arrested woman is suspected of having, in multiple cases since at least 2022, illegally taken in Chinese nationals in her apartment-based brothel. They engaged in prostitution without registration. The 58-year-old thereby secured herself 'a significant source of income over the long term'.⁵⁸

⁵⁴ <https://www.berlin-live.de/berlin/aktuelles/berlin-polizei-grosse-razzia-prostitution-15-objekte-id537964.html>

⁵⁵ <https://www.hessenschau.de/panorama/prostituierte-aus-china---razzia-gegen-schleuserbande-in-hessen-v1,razzia-schleuser-wiesbaden-100.html>

⁵⁶ <https://www.swr.de/swraktuell/rheinland-pfalz/ludwigshafen/prostitution-massagesalon-landau-frankenthal-zwangsprostitution-minderjaehrige-100.html>

⁵⁷ <https://rhein-ahr-anzeiger.de/frauen-wirksam-vor-gewalt-schuetzen/>

⁵⁸ <https://www.mdr.de/nachrichten/sachsen/chemnitz/frau-menschenhandel-prostitution-festgenommen-100.html>

Thuringia

April 2025:⁵⁹ Illegal Prostitutes in Weimar: Seven Thai Women Handed Over to Immigration Authorities

August 2025:⁶⁰ Majority from Eastern Europe: Of the 242 women engaged in prostitution, 54 held Romanian, 40 Hungarian, and 37 Bulgarian citizenship.

Schleswig-Holstein

January 2025:⁶¹ A sex buyer is alleged to have severely assaulted the Bulgarian woman. She was critically injured and lost her unborn child. 'Prostitution is like a self-service shop for perpetrators of violence,' says the victim's lawyer.

May 2025:⁶² Suspicion of illegal prostitution and human trafficking

Berlin

According to official estimates from early 2025, 1,590 women in prostitution in Berlin are officially registered (around 21%), while approximately 6,000 more are unregistered (around 79%).

"They are trapped in Berlin's sex industry—violence and abuse are their daily companions," states the organisation Samaritan's Purse, which provides support to women and girls acting on the streets of Kurfürstenstraße. The project leader, Marina Nobiling, describes the situation as follows:

'The women we meet mostly come from Eastern Europe. Almost all want to leave prostitution. A few say they 'work' in prostitution voluntarily. How voluntary this really is, however, often remains doubtful upon closer questioning.'⁶³

October 2025: Berlin Vocational Schools Missing Hundreds of Vietnamese Trainees

'Nobody knows where they ended up,' said the trade unionist Sebastian Riesner, who is also a member of the school board, to RBB. It is possible that they have slipped into illegal work, for example in nail salons or even into prostitution.'⁶⁴ Further articles on residential prostitution across Germany also point to this.⁶⁵

Hamburg

May 2025:⁶⁶ ,The demand is shifting toward very young girls. What is new for us is that the cases all involved girls between twelve and fourteen years old. We have had isolated cases of very young girls before, but having so many young girls concentrated like this is rather unusual. We also observe that the demand in online forums is already shifting toward very young girls.'

⁵⁹ <https://www.mdr.de/nachrichten/thueringen/mitte-thueringen/weimar/puff-prostitution-polizei-100.html>

⁶⁰ <https://www.mdr.de/nachrichten/thueringen/mehr-prostituierte-sexarbeit-100.html>

⁶¹ <https://www.ndr.de/nachrichten/schleswig-holstein/Prozessaufakt-am-Landgericht-in-Kiel-Prostituierte-berichtet-von-Gewaltexzess,prostituierte156.html>

⁶² <https://www.ndr.de/nachrichten/schleswig-holstein/Schleuserkriminalitaet-und-illegale-Prostitution-Durchsuchungen-in-SH,shnews2348.html>

⁶³ <https://www.bz-berlin.de/meinung/kolumne/kolumne-mein-aerger/gewalt-prostituierte>

⁶⁴ <https://www.zeit.de/news/2025-10/01/rbb-berufsschulen-vermissen-hunderte-vietnamesische-azubis>

⁶⁵ <https://www.tagesspiegel.de/gesellschaft/panorama/bundesweite-durchsuchungen-vorwurf-menschenhandel-razzien-in-mehreren-bundeslandern-13512052.html>

⁶⁶ <https://www.ndr.de/fernsehen/sendungen/panorama3/meldungen/Prostitution-Die-Nachfrage-geht-in-Richtung-sehr-junger-Maedchen,interviewfairlove100.html>

Juli 2025:⁶⁷ 'At night, men stand on the meadow opposite and masturbate while the women stand at the window,' ...'The fatal thing is that violence is part of everyday life for some who work on the streets.' ...'In places where higher fees are paid, in my opinion, more German citizens are active,' says Anna, a social worker at Sperrgebiet.

Julii 2025:⁶⁸ The man was initially charged with several counts of forcing his son into prostitution. He is alleged to have coerced the then 15-year-old into sexual acts with, among others, a Protestant pastor.

Bremen

August 2025:⁶⁹ Outbreak of violence in Bremen's red-light district

February 2024:⁷⁰ 'There is a growing incidence of human trafficking, forced prostitution, and organized crime, exposing women to increasingly precarious and dangerous situations.'

Recommendation Article 11 Question 6:

Germany should systematically record and analyze violence against women in the context of prostitution and other particularly vulnerable groups, e.g. Roma women, to ensure targeted prevention, protection, and support in line with the Istanbul Convention.

Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution

In its Baseline Evaluation (paragraph 26, Article 6) ...

26. GREVIO encourages the German authorities to integrate the gender dimension of violence against women into the development of laws, policies and measures to prevent and combat all forms of violence against women. Such a gender-sensitive approach should be based on an understanding of the link between violence against women and the structural inequalities between women and men, with the aim of addressing the specific needs of women victims as well as raising awareness of and counteracting the negative stereotypes against women which legitimise and sustain violence against women.⁷¹

...and (paragraph 79, Article 12)

79. GREVIO encourages the German authorities to ensure that preventive action incorporates, approaches for the prevention of violence against women and girls exposed to or at risk of intersectional discrimination, on the basis of their experience, such as women and girls with disabilities, homeless women and migrant women and girls. Programmes and activities for the empowerment of women and girls should form part of preventive measures, as should specific action tailored to men and boys.⁷²

⁶⁷ <https://fink.hamburg/2025/07/hilfe-ohne-urteil-wie-die-beratungsstelle-sperrgebiet-sexarbeiterinnen-unterstuetzt/>

⁶⁸ <https://www.ndr.de/nachrichten/hamburg/prostitution-von-15-jaehrigen-vater-wegen-beihilfe-verurteilt,prozess-186.html>

⁶⁹ <https://www.weser-kurier.de/bremen/gewaltausbruch-in-bremens-rotlichtmeile-24-jaehriger-vor-gericht-doc81tftxz5fxu16vbwcoop>

⁷⁰ <https://www.sueddeutsche.de/politik/prostitution-bremens-buergerschaftspraesidentin-fordert-sexkauf-verbot-dpa.urn-newsml-dpa-com-20090101-240216-99-14086>

⁷¹ Part I Purposes, definitions, equality and non-discrimination, general Obligations E. Gender-sensitive policies (Article 6), No. 26 page 17

⁷² Part III Prevention, A. General obligations (Article 12), page 30

...and (paragraph 18, Article 14)

C. Education (Article 14)

18. GREVIO strongly encourages the German authorities to take the necessary legal and other measures, including by involving all relevant actors, to ensure a more even degree of teaching, in a compulsory manner, of the principles set out in Article 14 of the Istanbul Convention, notably nonstereotyped gender roles, mutual respect, non-violent conflict resolution in interpersonal relationships and the right to personal integrity, and to ensure information is provided on the different forms of gender-based violence against women. This should be done through the exchange of existing practices among the different federal states and through common approaches identified in the framework of the Conference of Ministers of Education and Cultural Affairs on the basis of a mapping of relevant existing teaching materials, cross-curricular learning areas and other teaching approaches (paragraph 90).⁷³

Our responses to the questions under No. 9 on Article 12 and No. 10 on Article 14 demonstrate that, through its prostitution laws, Germany reinforces gender stereotypes in society and thereby, in relation to violence against women and girls in the context of prostitution, acts contrary to the implementation of Articles 6, 12 and 14.

Article 12: General obligations – Question 9.a.

9. Please provide information on any primary prevention measures aiming to change mentalities and attitudes in relation to violence against women and to reduce women's exposure to gender-based violence by:

9 a. addressing harmful gender stereotypes and prejudices, customs and traditions based on the idea of the inferiority of women;

Article 12 Answer to question 9.a.: Germany fuels gender stereotypes: Undermines equality

Germany exhibits a structural deficit in the area of primary prevention against violence toward women, which results from the legalisation of the purchase of sex. The Istanbul Convention obliges the States Parties to change attitudes and social structures that place women in a position of subordination. Instead, German prostitution legislation creates conditions that reinforce harmful gender stereotypes, expose women to multiple forms of discrimination, and strengthen men's sense of entitlement.

Stereotypical roles shape social structures and influence how women and men are perceived and treated. Stereotypes are harmful and lead to material inequality. In prostitution, stereotypical notions of women and men become particularly visible and underscore the damaging—and often fatal—consequences that stereotypes can have. Women in prostitution are degraded into objects made sexually available to men, while men represent the demand side of prostitution and perceive access to a woman's body as their right. This dynamic fuels existing stereotypes and exacerbates gender inequality far beyond the immediate context of prostitution.

In Germany, the prostitution market is legalized. In addition to the sale and purchase of sexual acts, the operation of brothels and forms of pimping are also legal.⁷⁴ The violence that women experience in and

⁷³ Part III Prevention, C. Education (Article 14) page 32

⁷⁴ § 12 Prostitution Protection Act; pimping §181a of the Criminal Code

through prostitution is not only concealed by the legal definition of prostitution as a 'sexual service'⁷⁵, but also promotes violence by enabling perpetrator-friendly structures.⁷⁶ German legislation makes a legal distinction between 'voluntary prostitution'⁷⁷ and 'forced prostitution'⁷⁸, although this is not possible in practice. This is the main legal 'system error' in Germany. By this sex buyers find justifications not only in cases of the - legally hardly verifiable - knowing use but also for their own sexual offences and violence. The legislator has made it possible for the declaration of intent under contract law and the consent justifying criminal law to be juxtaposed in a fundamentally dangerous situation, in which witnesses are naturally never present and other evidence is not possible. This comparison predominantly harms women and favours men. Not only does this violate individual rights, but it also hinders gender equality at the societal level. The vast majority of prostitutes are female, but boys and men are also involved in prostitution.⁷⁹



Since the regulation of the prostitution market 22 years ago, the situation of prostituted women has worsened, and the number of women brought into prostitution has also increased due to the 'market expansion'. It is estimated that between 150,000 and 250,000 women are prostituted in Germany. One-fifth of registered prostitutes hold German citizenship.⁸⁰

Prostitution in Germany - hinders gender equality - fuels gender stereotypes

The fact that the majority of those who purchase for sexual acts are men, while most prostitutes are women, has significant effects on stereotypical perceptions of the sexes, further entrenching inequality. Prostitution constitutes a form of violence against women because it is rooted in societal norms and structures that assign

⁷⁵ § 2 Prostitution Protection Act

⁷⁶ In this context, 'perpetrator-friendly' means that third parties can legally earn money from the prostitution of others, and the purchase of sexual acts itself is also legal. However, the exploitation and violence that often accompany the prostitution of others remain largely unpunished, making sexual exploitation a crime with low law enforcement risk for the perpetrators

⁷⁷ This concerns the Civil Code, Prostitution Act (since 2001), and Prostitution Protection Act (since 2016).

⁷⁸ This concerns the Criminal Code § 232a

⁷⁹ Bundesministerium für Familie Senioren Frauen und Jugend
<https://www.bmfsfj.de/bmfsfj/themen/gleichstellung/frauen-vor-gewalt-schuetzen/prostituiertenschutzgesetz/gesetzliche-regelungen-80646>

⁸⁰ 2023: Of the approximately 30,600 registered prostitutes, 5,400 had German nationality. This corresponds to a share of 18%. The three most common foreign nationalities of prostitutes were Romanian with 11,100 (36% of all registered prostitutes), Bulgarian with 3,400 (11%) and Spanish with 2,100 (7%).
https://www.destatis.de/DE/Presse/Pressemitteilungen/2024/07/PD24_271_228.html

women a subordinate position to men. Prostitution serves as a tool not only to reinforce this position for the directly affected woman but also to signal to all women that men have power over them and their bodies. The legalization of the prostitution market legitimizes this untenable notion and harmful structure on a legal level. Only in prostitution does the payer place primary importance on the gender and physical characteristics of the person being paid:

1. **Reinforcement of Traditional Roles:** This dynamic solidifies the image of women as passive objects who are expected to be sexually available to men.
 2. **Cementing Stereotypes:** Prostitution reinforces stereotypical perceptions of women, particularly the notion that women's bodies are for sale to satisfy men's desires.
 3. **Impact on Self-Esteem:** Women in prostitution often experience stigma and discrimination, which can lead to low self-esteem. This may further reinforce the idea that women are worth less than men.
 4. **Entrenchment of Power Inequalities:** Prostitution reflects and strengthens existing hierarchies. It suggests that men have a right to access women's bodies.
 5. **Influence on Relationship Dynamics:** The normalization of prostitution can shape expectations in partnerships and contribute to the objectification of women beyond prostitution.
- These effects contribute to the maintenance and reinforcement of traditional and harmful stereotypes, making equality between men and women in society more difficult to achieve.

Article 12: General obligations – Question 9.b.

9. Please provide information on any primary prevention measures aiming to change mentalities and attitudes in relation to violence against women and to reduce women's exposure to gender-based violence by:

...

b. addressing the heightened exposure to gender-based violence by women and girls at risk of intersectional discrimination;

Article 12 Answer to question 9.b.: Germany fuels gender stereotypes: Women as commodified sex objects

Most prostituted women have a migrant background, are affected by poverty, and got into prostitution at young age. Most of the women in the prostitution market come from south-eastern Europe.⁸¹ Many of these women belong to highly discriminated minorities. Women from Nigeria and some Asian countries (e.g. China) are also disproportionately represented in prostitution and are mostly victims of human trafficking.⁸² Many of the prostituted women were victims of sexual, physical, or psychological violence in their childhood or youth and have already learned to dissociate.⁸³ For some young women, prostitution is also a form of self-harming behaviour due to violence they have experienced. For the most part, prostitutes are controlled by others. Their everyday life is characterized by economic coercion, multiple dependencies, and unimaginable

⁸¹ Federal Criminal Police Office, "The Victims", "Die Opfer"

More details and sources regarding the profile of women and girls in prostitution in Germany in our Shadow Report 2021, COE "Istanbul Convention", page 47 - 48

⁸² Federal Statistical Office: https://www.destatis.de/DE/Presse/Pressemitteilungen/2023/09/PD23_368_228.html

⁸³ Kraus, Ingeborg (2022): Human trafficking and prostitution from a psychotraumatological perspective. <https://www.trauma-and-prostitution.eu/category/wissenschaftliche-texte/mechanismen-dissoziation-trauma/>

violence.⁸⁴

Prostitution has always been and still is an expression of structural inequality by cementing the image of women as service providers for male needs and maintaining patriarchal power relations.

Prostitution fuels the stereotype of men as 'the doers' and women as objects, reflecting deeply rooted stereotypical roles that portrays men as dominant actors with economic and sexual power, while women are dehumanized as commodities. The constant objectification of women in prostitution promotes this stereotype.

A distinction is made between seven forms of perceiving a person as an object:⁸⁵

- a) to use someone for a specific purpose (instrumentality),
- b) to contest the autonomy of a person (denial of autonomy),
- c) deny a person's activity or ability to act (inertia),
- d) to regard the person as interchangeable by others (transferability),
- e) not respecting a person's personal boundaries (vulnerability),
- f) to regard the person as something that can be bought or possessed (possession) and
- g) denying the person experiences and feelings (denial of subjectivity)

These forms of objectification are deeply rooted in prostitution, as all the aspects described become visible in the prostitution system. Women are instrumentalized by using their bodies to satisfy the demand driven by men. Their autonomy is called into question, as economic coercion, dependencies and social pressure restrict their freedom of choice. Inertia is shown in the reduction of the woman to a passive role that is at the mercy of other desires. Transferability becomes clear because women in prostitution are often seen as interchangeable goods that have no individual value. Vulnerability is an integral part, as boundaries are regularly crossed, and the system is often accompanied by violence or exploitation. The perception of women as purchasable is reflected in the idea of ownership, which legitimizes the commercial use of their bodies. Finally, subjectivity is denied, as the experiences, feelings and needs of the women behind the role of 'service provider' remain invisible.

By placing the human body in the market, the prostitution system renews the objectification of women and their bodies. Their body is objectified, eroticized, sexualized, reduced to parts of the female anatomy such as breasts, mouths and genitals.⁸⁶

The legalization of prostitution market in Germany has fostered to normalize and institutionalize these forms of objectification. It reinforces the idea of women as objects that can be made available for the satisfaction of the needs of others, thus contributing to a culture that systematically devalues women's physical, sexual and emotional autonomy.

⁸⁴ See also KARO e.V. (2023): Annual report 2022, <https://www.karo-ev.de/downloads/jahresberichte.html>
SOLWODI: <https://www.solwodi.de/seite/653634/prostitution.html>

⁸⁵ M. Nussbaum, 1995, S. 257; Objectification. *Philosophy & Public Affairs*, 24(4), 249–291.

⁸⁶ Coalition for the Abolition of Prostitution (CAP): Last Girl first! Prostitution at the intersection of sex, race & class-based oppressions; A research conducted by Héma Sibi. 2022. ISBN 978-295821188-0-5

Behavioural patterns, prejudices, customs, traditions, socialisation and other practices based on the idea of women's inferiority or on discriminatory roles between the sexes promote violence against women.

The often-made statement 'Prostitution has always existed and will always exist' ignores the fact that this argumentation justifies historical injustices and leaves existing power relations untouched. The reference to the historical permanence of prostitution not only legitimizes the continuation of discriminatory role assignments but also hinders progress towards a society in which equality and respect for the dignity of all people are a priority.

Examples of how the objectification of women takes place in sex buyers' forums in Germany, due to the purchase of sexual acts, are provided in Appendix 1

Article 12: General obligations – Question 9.c.

9. Please provide information on any primary prevention measures aiming to change mentalities and attitudes in relation to violence against women and to reduce women's exposure to gender-based violence by:

...

c. encouraging all members of society, including men and boys, to contribute actively to preventing all forms of violence against women covered by the scope of the Istanbul Convention, and promoting the empowerment of women and girls in all areas of life, notably their participation in politics at all levels and in the labour market.

Article 12 Answer to question 9.c. Germany fuels gender stereotypes: The sexually driven man

A frequently cited argument in the debate on prostitution is that restricting or prohibiting prostitution would lead to an increase in rape cases. This assumption is based on the idea that men have an allegedly uncontrollable sexual drive that must be satisfied to prevent violence against women. This argument is highly problematic as it reproduces deeply ingrained stereotypes and does not withstand scientific, empirical scrutiny.

Firstly, this reasoning reinforces the stereotypical image of the 'instinct-driven man' who is unable to control his sexual behaviour and therefore relies on prostitution. This perspective strengthens the notion that male sexual behaviour is biologically determined and inevitable. However, scientific findings contradict this assumption. Criminologist Monika Frommel emphasizes that rape does not result from a lack of sex but rather from a desire for power and dominance: 'Rapes do not happen out of 'necessity' or because men lack access to sex, but because they want to exert power over women.'⁸⁷

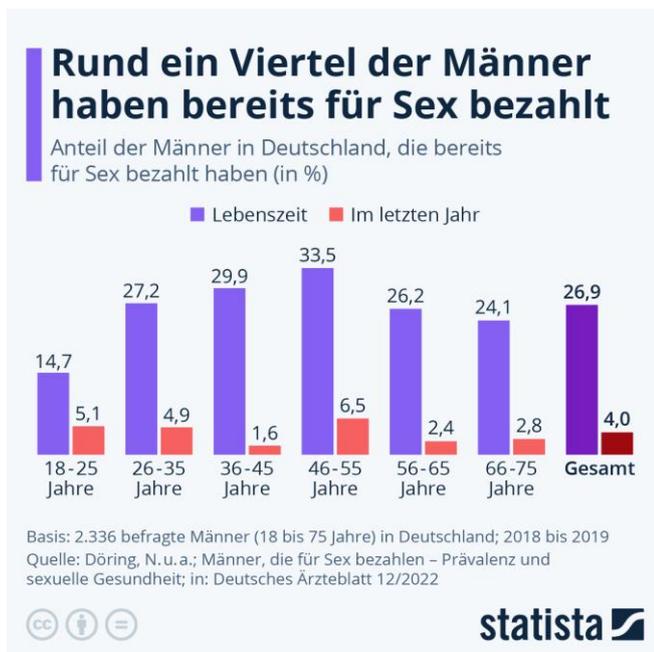
Secondly, this argument implies that prostitution serves a societal function by preventing men from committing sexual assaults. This not only misinterprets the root causes of sexualized violence but also shifts the responsibility for male behaviour onto women. The German Institute for Human Rights has stated on this matter: 'The notion that prostitution serves a protective function for other women fails to recognize the structural causes of sexualized violence and reduces women in prostitution to a societal 'safety valve'

⁸⁷ Frommel, Monika (2016): „Vergewaltigung als Machtausübung: Ein kriminologischer Blick auf Sexualdelikte“, in: *Kriminalistik* 70(6), S. 345–356.

function.⁸⁸

Empirical studies also show no correlation between a ban on purchasing sexual acts and an increase in sexualized violence. In Sweden, where the purchase of sexual acts has been banned since 1999, there is no evidence that rapes have increased as a result of the ban. An evaluation by the Swedish government in 2010 concluded that ‘there is no evidence to suggest that the ban has led to an increase in other forms of sexualized violence.’⁸⁹

Sexual violence, and prostitution is a form of sexual violence, is caused by societal factors such as patriarchal power structures, lack of law enforcement, and social norms which imply the subordination of women. Thus, the societal acceptance of prostitution contributes to the perpetuation of these power dynamics. A modern discourse on sex-aware justice should take these factors into account and move beyond biologically deterministic assumptions about sexuality.



About a quarter of men have paid for sex.

Proportion of men in Germany who have already paid for sex (in %)

lifetime

in the last year

Source: Döring N. u.a. statista⁹⁰

⁸⁸ Deutsches Institut für Menschenrechte (DIMR) (2019): ‘Menschenrechte und Prostitution: Eine Analyse zur geschlechterpolitischen Dimension der Debatte’.

⁸⁹ Justizdepartement Schweden (2010): „Evaluation of the Swedish Sex Purchase Act“. Stockholm.

⁹⁰ <https://de.statista.com/infografik/28711/anteil-der-maenner-die-bereits-fuer-sex-bezahlt-haben/>

Recommendations to Article 12 General obligations

Gender stereotypes are like fire:

**the more we fuel them,
the stronger they burn.**

We must stop fuelling them.



Germany exposes sexual self-determination to the mechanisms of the free capitalist market. Prostitution is neither controllable nor regulatable. The most effective instrument to abolish the harmful consequences of prostitution and its inherent harmful stereotypical perceptions is to abolish prostitution and the purchase of sexual acts. The most effective protection from prostitution is to prevent the entry into prostitution. The connection between stereotypical perceptions of women and men and their role in society, the social and cultural patterns and practices which are based on the idea of the inferiority of women under men and the system of prostitution must be reflected and taken into account.

Article 14: Education – Question 10.a.

Final Remarks and Summary of Recommendations

Violence in prostitution remains concealed, as sexual acts invariably occur in private and isolated settings. The dark figure increases due to the rising use of anonymously bookable premises.¹⁰²

Prevention measures aimed at warning or protecting women and girls from prostitution will always fall short of those implemented in countries that apply the Nordic Model, as long as Germany continues to institutionalize sexual acts for payment through legislation aligned with trade law. In a society governed by such a legal framework, Germany will therefore never be able to fully meet the requirements of Article 14 of the Istanbul Convention, for which GREVIO issued strong recommendations in its Baseline Evaluation.

A General Recommendation pursuant to Article 69 that addresses demand would be consistent with the objectives of the Convention and would not conflict with the different approaches of the State Parties.

Summary of Recommendations

Recommendation Art. 7 Question 1: Integrate expertise an perspective of survivors of Prostitution

In addition to GREVIO's recommendation (I.C.2.3.b), it is particularly valuable and essential to draw on the expertise of women who have exited prostitution. Unlike women currently in prostitution, survivors of prostitution can reflect on their experiences, speak openly about long-term impacts, risks, and exploitative mechanisms, without their statements being shaped by immediate survival strategies or financial dependency. This perspective therefore provides especially reliable and in-depth insights that are indispensable for developing effective measures and recommendations.

Recommendation Art. 7 Question 1: Explicit reference to women in prostitution in future reports

¹⁰² Drucksache 21/910 vom 10.12.2024 zur Kleinen Anfrage in der Bremischen Bürgerschaft, Antwort 7 des Senats der Stadt Bremen zu Seite 5 Frage 7 a
https://www.bremische-buergerschaft.de/drs_abo/2024-12-10_Drs-21-910_6000d.pdf

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

Recommendation Art. 11 Question 6: Elaborate a General Recommendation pursuant Article 69

GREVIO is encouraged to consider elaborating a General Recommendation under Article 69, recommending that States adopt measures for the prevention of gender-based violence in the context of prostitution.

Recommendation Art. 11 Question 6:

In line with the coalition agreement between the CDU/CSU and SPD, the Ministry for Family Affairs is currently assembling a commission of independent experts, which will then develop the necessary adjustments to the Prostitute Protection Act.

The BVNM urges GREVIO to carefully examine the KFN evaluation of the Prostitute Protection Act (ProstSchG). Key points for attention:

1. Methodological flaws and bias: Ask critical questions about the study's methodology, sample, and the political bias of its authors.
2. Representation of vulnerable women and survivors of prostitution: Ensure that the perspectives of the most vulnerable women in prostitution and survivors of prostitution are adequately considered.
3. Validity of conclusions: Critically assess any claims regarding the effectiveness of the ProstSchG, given the evaluation's limited reliability.
4. Observe the composition of the commission.
5. Encourage German authorities to implement practical measures that improve protection and support for women in prostitution, including exploring approaches such as the Nordic Model.

This focus will help GREVIO ensure that its evaluation reflects the real conditions and challenges faced by women in prostitution in Germany.

Recommendation Article 11 Question 6:

Germany should systematically record and analyze violence against women in the context of prostitution and other particularly vulnerable groups, e.g. Roma women, to ensure targeted prevention, protection, and support in line with the Istanbul.

Recommendations to Article 12 General obligations

Gender stereotypes are like fire:

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prostitution and its inherent harmful stereotypical perceptions is to abolish prostitution and the purchase of sexual acts. The most effective protection from prostitution is to prevent the entry into prostitution. The connection between stereotypical perceptions of women and men and their role in society, the social and cultural patterns and practices which are based on the idea of the inferiority of women under men and the system of prostitution must be reflected and taken into account.

Recommendation Article 14 Question 10a:

GREVIO should urge Germany to strengthen prevention by integrating gender-equality and consent education. The State Party should ensure that its legal and policy framework on prostitution does not undermine prevention goals or reinforce harmful gender stereotypes. Educational and awareness-raising measures must promote non-violence, mutual respect, and the non-commercialization of sexuality among the whole society.

Appendix Sexbuyer-Forums

The objectification of women continues in punters' forums. These are websites where punters exchange information about brothels, escort agencies and very specifically about individual women, evaluate them (e.g. narrowness of the orifices, enthusiasm). Often there are extremely discriminatory, violent, insulting or objectifying descriptions that are deeply misogynistic, racist, sexist, inhuman and trivializing violence.¹⁰³

'No whores left – the problem is that in the past few months 5 whores have died of an overdose. It all started with Melanie...'

(Source: ao-huren, 13.02.2025, 15:37)

'She denied it and pulled her sleeves even further down. I thought she was hiding something, and with both hands I pushed up her long sleeves. A shock. I had never seen anything like it. As far as I had pushed up her sleeves, her arms were covered in wounds. Both arms were completely destroyed from drug injections. Real wet, bleeding wounds covered with pus.'

(Source: ao-huren, 21.07.2025, 18:10)

'After the doorbell rang and the door opened, there was screaming in the flat with the pimp. No idea what it was about. You couldn't understand it.'

(Source: ao-huren, 11.05.2024, 20:16)

'She didn't control the slipped condom and so after a few thrusts I could cum inside bare.'

(Source: ao-huren, 21.07.2025, 20:06)

'Fucking is her job. Occupational safety is the employer's responsibility. – if self-employed, then hers.'

(Source: ao-huren, 29.08.2025, 14:13)

'You got a primeval time and every 20 minutes the next one came to fuck. Does anyone know the lady or the alleged boyfriend in the car? Had advertised on the erotic market, very skinny in her late 40s.'

(Source: ao-huren, 18.01.2025, 14:35)

'Acceptable blower' (Source: ao-huren, 15.01.2025, 22:31)

'I always wanted a German-Oriental.' (Source: ao-huren, 15.01.2025, 11:12)

'She is very young, still has some baby fat. But all very firm young flesh.'

(Source: ao-huren, 26/11/2024, 16:45)

'I think Augsburg needs a thread about Asian girls/women! Because not every woman is worth a separate thread! If, for example, you are disappointed that the Japanese woman looks like a Chinese woman and is 20 years older, there is no need to open a thread.'

(Source: Lusthaus-Huren-Test-Forum, 30.12.2023, 20:26)

'As I noticed, teeny Emi was fucked out of order and broken.' (Source: ao-huren, 29.05.2023, 00:27)

'Sure, there's a lot of not so great things going on, Bulgarians...hardcore junkies, but every now and then something happens. Ela, for example, probably addicted to crack, ...I took one with me in spring, absolutely no junkie, who had just been kicked out by her husband and didn't know what to do (she told me), ...'

(Source: ao-huren, 30 Jun 2023,00:12)

¹⁰³ <https://dieunsichtbarenmaenner.wordpress.com/tag/sex-buyer/>

'I said to her, can we go and is a 10 ok? ...While we were fucking, I noticed bluish discolouration on her bottom and back, which I initially thought were tattoos. When I stroked them, I realised that they were large scabs. Actually, I should have cancelled immediately, but ...the whole thing for a 10 ...you have to make 'compromises'.'

(Source: ao-huren, 09.11.2023,11:49)

'Proud price, for such an old sled'

'From time to time P. is operational in the morning in the X & alternately in the Deluxe.'

(Source: ao-huren, 15/07/2021, 03:11)

'Yes, of course. I get lots of free tickets if I expose their whores as AO¹⁰⁴ bunkers.'

(Source: ao-huren, 15/07/2021, 03:11)

¹⁰⁴ „AO“ means “Alles ohne” = without condom



**BUNDESVERBAND
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Zur Umsetzung des
Gleichstellungsmodells
in Deutschland e.V.