Dear Ms Skelton,
Dear Ms Khazova,
Dear Ms Todorova,
Dear Mr Mezmur,
Dear Members of the Committee on the Rights of the Child,

ECPAT Germany’s Supplementary Report on the OPSC clearly shows that even though we can see improvements in the realisation of children’s rights regarding protection from sexual exploitation, Germany is still far from being compliant to the Optional Protocol’s requirements.

Besides the Supplementary Report on the OPSC already submitted to you, we would like to ask you to draw attention to the following two points that require specific attention due to recent, current developments. Thank you for taking into consideration our expertise in designing the List of Issues.

1. Recent cases show the urgent need for a comprehensive national strategy

   - Cases of sexual exploitation of children as in Staufen (2017), Lügde (2018), Bergisch-Gladbach (2019) and Münster (2020) clearly show that sexual exploitation of children is taking place in Germany nationwide. Even though investigations often start with an individual case of abuse, all of these recent cases were more than that. They were complexes of trafficking, of organized sexual exploitation of children and they all included online dimensions.

   - ECPAT Germany welcomes the establishment of the National Council on Sexual Violence Against Children and Adolescents in 2019 and the institutionalisation of the Independent Commissioner for matters concerning sexual abuse of children (UBSKM). But as the last few years show, these institutions are neither structured nor financed in a way that would enable the German government to build up an actionable response towards the needs revealed by the recent cases.

   - In 2014 the Committee on the Rights of the Child urged the German Government in the Concluding Observations to develop a training strategy. Even though all experts agree that especially regarding exploitation of children qualification is essential to identification, no progress has been made so far. But how should children receive assistance or protection if staff (for example in Youth Offices) is not standardly trained?

   - The implementation process of the Federal Cooperation Concept “Protection and Help in cases of Trafficking in and Exploitation of Children” ¹ has started and first successes have been recorded at the local level with regard to network building. However, until now no Federal State (Bundesland) so far adopted it on a legal binding manner. Progress is needed to comply with the demands of the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) regarding a National Referral Mechanism in cases of trafficking and the standard formulated in the OPSC.

   ➔ We kindly request you to point out the issues of a lack of a comprehensive national strategy on prevention and intervention regarding sexual abuse and exploitation online/offline including training standards (education and further training) and the need of a national referral mechanism for exploited children.

2. COVID 19 demonstrates the need to prioritise protection of children in the digital environment

- The COVID-19 pandemic exacerbates the vulnerabilities of children in various regards. No evidence in numbers is yet available showing a rise of violence against children in Germany. But there are more than worried concerns by professionals around the world regarding the growing vulnerabilities and the situations children are facing at the moment. ECPAT sees the need to expand capacities of assistance to children at risk and victims/survivors of violence.

- For Germany, the restrictions of social contacts for almost a year now led to strong limitations in the possibility for victims to be identified or to seek for assistance. In a time when opportunities for offline crimes are greatly reduced, one can strongly assume that online crimes will rise. Europol’s alarming data from June 2020 already show that there have been significant increases in activity relating to child sexual abuse and exploitation on both the surface web and dark web during the COVID-19 lockdown period. Strong and effective law enforcement is needed to enable for children to feel safe online but perpetrators do not. We are not aware that a restructuring of law enforcement is planned to better and effectively protect and investigate.

- The update of the Youth Media Protection Act (Jugendmedienschutzgesetz) in 2020 designates protection targets such as the “personal integrity” of children. This is an important step, but the law does not include provider’s responsibility in a sufficient way nor goes an implementation strategy on the protection of children’s personal integrity along with it.

- Furthermore, a sustainable perspective is needed. When children are falling into poverty, they are at risk to be more vulnerable to exploitation. Besides that, travel restrictions prevented offenders from travelling and as Europol indicates, they have shifted their focus to the exchange of child sexual abuse materials online. This may stimulate the demand for this type of material online beyond the lockdown. On top this might not be the last pandemic we will have to face and therefore intervention is needed now to be prepared for the future.

➤ We kindly request you to point out the issues of the existing lack of a strategy tackling the protection of children from violence in the digital environment. Offences against children in this environment need to become a focus of policy making and the law enforcement authorities to respond to the reality of children’s lives (especially in lockdown times).

---

ECPAT Germany is part of the global ECPAT network, which is working since 30 years to end the sexual exploitation of children. Nowadays in over 100 countries: [www.ecpat.org](http://www.ecpat.org) / [www.ecpat.de](http://www.ecpat.de)

Contact: Jana Schrempp (Program Manager), schrempp@ecpat.de, mobile: +49 178 86 83 257

Lanzarote Committee: [https://rm.coe.int/covid-19-lc-statement-en-final/16809e17ae](https://rm.coe.int/covid-19-lc-statement-en-final/16809e17ae)
ECPAT International: [https://ecpat.exposure.co/covid19](https://ecpat.exposure.co/covid19)