

UNDER THE RADAR: LABOR EXPLOITATION AND FORCED LABOR IN GERMANY

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How are labor exploitation and forced labor defined in Germany?

Labor exploitation, forced labor, human trafficking—to many people, these terms may seem identical. In fact, there are differences between them.

Human trafficking is a serious violation of human rights. The German Criminal Code (§232 StGB) defines human trafficking as the act of recruiting, transporting, transferring, harboring, or receiving a person by “exploiting their personal or economic distress or helplessness associated with their stay in a foreign country,” among other things, for the purpose of exploiting them. This exploitation can serve various purposes: sexual exploitation, forced begging, and labor exploitation.

Section 232 of the German Criminal Code (StGB) is currently (July 2026) undergoing reform, as are the following sections. A corresponding draft bill was approved by the Federal Cabinet in May 2026. The final wording may therefore differ.

There is no uniform definition of the term “labor exploitation.” Furthermore, not every violation is relevant under criminal law. Unpaid overtime, failure to pay wages in the event of illness—all of these issues fall primarily within the scope of labor law. Exploitation of labor in the criminal law sense (Section 233 of the German Criminal Code (StGB)) only applies when a person’s specific situation is exploited for the purpose of exploiting them. Employment is considered exploitative, among other things, when working conditions are significantly worse than what is customary for that type of work in the industry.

Forced labor, on the other hand, is an extreme form of labor exploitation. Unlike forced labor, the elements of the offense of forced labor (Section 232b of the German Criminal Code) are only met if a person’s free will has been influenced.

How many people are affected?

It is difficult to determine specific numbers of victims. This is due to the inconsistent definition of the term “labor exploitation,” the large number of unreported cases in this area, and the fact that the figures are not systematically recorded by a central agency.

By way of comparison: In its 2024 Federal Situation Report on Human Trafficking and Exploitation, the Federal Criminal Police Office (BKA) recorded a total of 41 concluded cases involving 171 victims in the area of labor exploitation.¹ Only concluded criminal investigations under the relevant provisions of Sections 232 et seq. of the German Criminal Code (StGB) were taken into account. These were therefore exclusively cases known to the authorities—the so-called “known cases.”

The data from the National Coordination Group Against Human Trafficking (KOK) is broader in scope. In the same year (2024), the KOK documented a total of 659 suspected cases and released them for statistical analysis. This figure is based on data from participating specialized counseling centers. These cases do not necessarily have to be known to the security authorities. However, a large portion of the documented cases were classified by the counseling centers as suspected cases of forced prostitution. Only 59 of the 659 reported cases—about 9 percent—were classified as labor exploitation.² For this reason as well, it is difficult to compare the two sets of data.

Another figure is worth noting in this context: A study by the University of Bremen commissioned by the Hans Böckler Foundation estimates that there are between 100,000 and 200,000 cases of labor exploitation in Germany each year. This figure is based on an online survey of counseling centers, which were asked to report the number of cases they handled related to labor exploitation. The result extrapolated to Germany—10,000 to 20,000 cases per year—represents what is known as the “semi-hidden sector.” However, the study’s author assumes that only 10 percent of all those affected seek help from a counseling center. A further extrapolation yields a range of 100,000 to 200,000 cases per year.³

What causes this difference?

The BKA’s figure reflects only closed cases in this area. However, many victims are reluctant to report the exploitation or even to come forward with the facts of the case.

There are various reasons for this. Many victims fear retaliation from the perpetrators or the authorities if they report violations. Added to this are feelings of shame, language barriers, a lack of knowledge about which agencies to contact, and, in some cases, a lack of awareness that they are victims of a crime.

Furthermore, many victims find themselves trapped in a web of dependencies. Often, their housing is tied to their job. Losing their job can therefore lead to homelessness. People from outside the EU (third-country nationals) are particularly vulnerable. For them, their residence permit is often tied to their job as well. Losing a job can therefore also have consequences regarding their right of residence.

¹ Bundeskriminalamt (2025), p. 15.

² KOK (2025a), p. 18.

³ Böhme (2024), p. 73



The particularly vulnerable situation of many third-country nationals is especially relevant in light of the changes in the German labor market. The lower end of the wage spectrum (comparable to the low-wage sector) was long dominated by migrant workers from other EU countries. In 2020, for example, EU citizens accounted for 60 percent of this segment.⁴

This trend is now on the decline. In 2024, for the first time since 2008, there were fewer people moving to Germany from the EU than there were leaving Germany for other EU countries. In contrast, the proportion of third-country nationals in this segment of the labor market is rising.

Under what conditions and in which sectors do victims of labor exploitation and forced labor work in Germany?

Here, too, there is no uniform, systematic data collection. It can be noted, however, that cases of labor exploitation and forced labor are concentrated primarily in the lower-wage bracket or the low-wage sector. The KOK identifies the construction industry, agriculture, the restaurant industry, the meat-processing industry, caregiving, and household-related services—particularly in private households—as key sectors.⁵

Many of these sectors are characterized by a system of outsourcing, or subcontracting. Larger companies outsource work to smaller subcontractors. Since these subcontractors often have only ten or fewer employees, they do not offer general protection against dismissal. Sometimes, subcontractors also outsource the work to other subcontractors. This gives rise to so-called subcontracting chains. This often opaque structure makes it difficult for unions and authorities to regulate and monitor this sector of the labor market.

This, in turn, leads to working and living conditions that are often precarious or even exploitative. There are industries in which many migrant workers receive no paid vacation, no sick pay, and are not compensated for overtime. Sometimes, their employers also pressure them to sign documents whose content they do not understand due to the language barrier.

In some cases, people are harmed by their supervisors, physically or psychologically attacked, or threatened. There are numerous cases in which the passports of those affected were confiscated to prevent them from fleeing.

Migrant workers in this sector are often housed in dilapidated dormitories or private apartments, where they share a small room with several other people, often at exorbitant prices.

⁴ Own calculations based on Bundesagentur für Arbeit (2020)

⁵ KOK (2025a) p. 14 and 39.



Case from the TIES Project: Masha's Story*

Masha* fled to Germany to escape the war in Ukraine. Like many other displaced people, she was seeking safety, stability, and the opportunity to support herself. Through an ad on social media, she accepted a job at a hotel in Bavaria. She was promised regular employment as a housekeeper, fair pay, and housing at the hotel.

The reality, however, was quite different: Masha lived in cramped quarters with several other people under poor sanitary conditions. She was required to work long hours without adequate breaks and received only a fraction of the wages she had been promised. The wages she actually received were well below the statutory minimum wage and were paid only irregularly.

Since she was dependent on the housing and her income, knew little about her rights in Germany, and was afraid of losing her job, she did not seek help at first. She also assumed that such difficulties were simply part of starting over in a foreign country. Her situation was initially invisible to authorities and support services, and she herself did not realize that she was a victim of labor exploitation.

It was only through JADWIGA's outreach work as part of the TIES project that the exploitation was identified. At an informational event held at a shelter for displaced persons and third-country nationals, JADWIGA's specialist counselors provided information on labor rights, potential signs of exploitation and human trafficking, and available support services. The event also offered an opportunity for confidential conversations.

After the event, Masha, who was visiting a friend there, approached the expert counselors and described her working conditions. In the subsequent conversations, several indications of labor exploitation were identified. JADWIGA then informed her about her rights and options for protection and referred her to additional support services.

Masha decided to accept the support. With professional guidance, she was able to escape the exploitative situation. She was placed in a shelter, filed a report with law enforcement, and received a residence permit as a victim of human trafficking. Later, she found a new, regular job with fair working conditions.

** Name and details have been altered.*



Which countries are the affected individuals from? And how did they come to Germany?

Here, too, there are differing sources:

According to the Human Trafficking Monitor published by the German Institute for Human Rights (2024), people from Romania are among the groups most severely affected.⁶ In the KOK survey for 2024, people from Romania and Georgia were particularly affected by labor exploitation.⁷ The 171 victims listed in the BKA's 2024 Federal Situation Report were primarily of the following nationalities: Slovak (64 victims), Moldovan (37), Vietnamese (19), and Ukrainian (8). German victims (2) are rarely recorded by the BKA.⁸

Recruitment takes place through various channels:

- Through recruitment agencies. These are particularly relevant for third-country nationals, as they must hold special visas for Germany and—unlike EU citizens—often cannot simply enter the country freely.
- Through digital platforms, such as ads on relevant online forums and social media.
- Through personal networks, that is, through people they know, and in some cases, family members.

Often, working and living conditions in Germany are misrepresented in these cases; in other words, people are lured to Germany with false promises.

To what extent are minors affected?

Minors are less represented than other age groups in cases of labor exploitation and forced labor.

The Federal Criminal Police Office (BKA) recorded a total of 209 concluded cases in 2024 involving various forms of exploitation of minors. The vast majority (195) were cases of commercial sexual exploitation. In the area of labor exploitation, however, the authorities recorded only two cases involving minors.⁹

What kinds of support are available for those affected?

There are a wide variety of counseling services available throughout Germany. They differ in terms of their focus and target audiences.

The “Faire Mobilität” counseling network primarily advises EU citizens on labor law. The “Faire Integration” program is aimed at third-country nationals. In addition, there are regional services offered by the regional branches of “Arbeit und Leben,” including BEMA— Berliner Beratungszentrum für Migration und Gute Arbeit (the Berlin Counseling Center for Migration and Decent Work).

There are specialized services addressing labor exploitation and human trafficking, which are criminal offenses. Notable examples include the specialized counseling centers networked through KOK, such

⁶ DIMR (2024), p. 26.

⁷ KOK (2025a), p. 18.

⁸ Bundeskriminalamt (2025), p. 16.

⁹ Bundeskriminalamt (2025), p. 21.



as JADWIGA in Bavaria. There are also telephone and online services, such as the Bavarian Anti-Trafficking Helpline.

Many counseling centers report a very high volume of clients. According to KOK, many of the counseling centers organized under its umbrella were at times unable to accept any new clients seeking advice.¹⁰

At the same time, this is only the tip of the iceberg. Not all those affected are aware of these services. Furthermore, many are reluctant to seek counseling because they fear the consequences.

What policy measures have been implemented in the past, and what was the effect?

In the recent past, there have been various policy initiatives aimed at improving workers' working and living conditions.

One example is the Occupational Safety and Health Control Act for the meat industry, which took effect in 2021. Since then, companies in the industry with more than 49 employees have been prohibited from hiring staff through subcontractors. They must hire them directly (direct hiring requirement). In addition, they must digitally track employees' working hours.

According to various studies, the law has led to a significant improvement in working conditions.¹¹ Since employees are now directly employed by the large companies (and no longer by subcontractors, some of which operate with a lack of transparency), it is easier for advisory services and authorities to investigate violations and contact those responsible. The requirement for digital time tracking has reduced instances of wage fraud.

Nevertheless, problems persist in the industry, such as with employee housing and recruitment abroad (see above). The same applies to compensation. According to reports, skilled workers are sometimes paid only as unskilled laborers.

Expanding the direct employment requirement to other industries is frequently discussed. Currently (June 2026), the Federal Ministry of Labor and Social Affairs is reviewing an expansion to the delivery service industry.

¹⁰ KOK (2025b)

¹¹ See Erol/Schulten (2025), Kärcher/Walser (2025) and Sommer et al. (2024)



Case from the TIES Project: Exploitation in the Construction Industry

A group of more than ten men from Tunisia was recruited to come to Germany with the promise of secure jobs in the construction industry, fair wages, and better prospects for themselves and their families. Many of them gave up steady jobs in Tunisia to do so. To finance their trip, some took out loans or borrowed money from relatives.

Once there, the promises were not fulfilled. The men lived in overcrowded, unsanitary accommodations and had neither health insurance nor social security coverage. They worked under poor conditions, while their agreed-upon wages were withheld. Furthermore, they were dependent on their employers for housing and matters related to their right of residence. Because the expected income failed to materialize, their families in Tunisia had to take on additional debt to support them in Germany.

During counseling sessions with Faire Integration München, it became clear that the issues went beyond mere labor law violations. The deceptive recruitment, indebtedness, and dependency also pointed to human trafficking for the purpose of labor exploitation. Faire Integration München therefore contacted the specialized counseling center JADWIGA.

Both organizations jointly reviewed the case—both from the perspective of labor law and with regard to possible signs of human trafficking. As a result, the case could be viewed not only as a dispute over unpaid wages, but also as a potential form of exploitation in which those affected required specialized counseling and protection.

After being referred to JADWIGA, the men received individual counseling, psychosocial support, and information about their rights and options for protection. Together with them, the organization explored how they could safely leave the exploitative situation and receive assistance with housing, living expenses, and residency issues.

As their trust grew, several men decided to cooperate with law enforcement authorities. They reported on how they were recruited, their working conditions, and the methods used by those responsible to maintain their dependence. As potential victims of human trafficking, they were granted a reflection and stabilization period. This period, provided for by law, is intended to allow victims to first find peace of mind, accept counseling, and make informed decisions about the next steps.

This case shows that human trafficking can be hidden behind issues that appear to be purely related to labor law. Labor rights counseling centers therefore play an important role in the early detection of exploitation. Faire Integration München and JADWIGA continue to provide support to these men. This support includes counseling, psychosocial support, legal assistance, and collaboration with the relevant authorities.



Also relevant to the issue of labor exploitation is the German Supply Chain Act, which took effect in 2023. It requires companies to uphold human rights throughout global supply chains. The law was applied, among other instances, during the truck drivers' strike in Gräfenhausen, Hesse. The drivers, who came from Uzbekistan and other countries, had not been paid by their Polish trucking company for months. The Federal Office for Economic Affairs and Export Control (BAFA), which is responsible for enforcing the law, reviewed the documents and was thus able to identify the responsible clients. The resulting pressure led to a settlement with the drivers. However, the federal government effectively weakened the law in the fall of 2025: The reporting requirement was eliminated, and only serious violations are now subject to penalties.

Also worth mentioning are two National Action Plans adopted by the federal government: the National Action Plan Against Labor Exploitation and Forced Labor (NAP A/Z), adopted in February 2025, and the National Action Plan to Prevent and Combat Human Trafficking and Protect Victims (NAP MH), adopted in December 2024. National Action Plans are not legally binding; they set out policy objectives. The two action plans include measures to promote counseling services for victims, to facilitate cross-border networking among relevant stakeholders, and to raise awareness among government agencies (NAP A/Z), as well as measures to better protect victims and intensify criminal prosecution (NAP MH).

The revision of Sections 232 et seq. of the Criminal Code also serves this latter objective. The previous wording of the criminal offenses had proven difficult to prove in practice. The revision aims to simplify the definitions and facilitate criminal prosecution. Additionally, new forms of exploitation—such as surrogacy, forced marriage, and illegal adoption—are to be included. In addition, the knowing use of services provided under exploitative conditions is to be made a criminal offense.

What TIES does

The EU-funded TIES project supports third-country nationals in Germany, Italy, and Greece who are at risk of or affected by labor exploitation or exploitation involving criminal acts. In Germany, the IRC is implementing the project in partnership with JADWIGA.

The focus is on helping those affected recognize their situation early on and providing them with safe access to protection and support services. To this end, TIES combines digital street outreach on social media with on-site outreach counseling. At the same time, professionals in government agencies, the police, and social services are trained to better recognize signs of exploitation and to safely refer those affected to specialized counseling centers. This approach is complemented by events, webinars, and policy recommendations aimed at further developing identification and protection mechanisms at the national and European levels.



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