ماعت للسلام والتنمية وحقوق الإنسان
Maat For Peace, Development, and Human Rights

Mid-Term Report Submitted to the Universal Periodic Review Mechanism Regarding Germany

Germany has reviewed its human rights record four times before the Universal Periodic Review (UPR) mechanism: first on February 2, 2009; followed by the second session on April 25, 2013; the third on May 8, 2018; and finally, the fourth session on November 9, 2023. During the third review, Germany received 259 recommendations, of which it accepted 209. In the fourth UPR, Germany received 346 recommendations, supporting 283 of them. This represents a notable increase of approximately 35% in the number of accepted recommendations compared to the third round. These recommendations primarily focused on issues of non-discrimination, the situation of refugees and migrants, combating violence against women, and calls for full adherence to fundamental human rights treaties, reflecting the broadening scope of raised issues and increasing engagement with the UPR mechanism.[1] This report aims to track the implementation of the accepted recommendations by Germany during the fourth UPR, highlighting shortcomings and signs of delay that continue to hinder the full implementation of certain obligations. It focuses on key issues for which Germany received intense recommendations that currently carry an urgent character, to evaluate the course of official responses and monitor the practical steps achieved against the challenges that contributed to delays or setbacks in implementing several recommendations.

1. Equality and Non-Discrimination

Germany received 58 recommendations related to equality and non-discrimination during the fourth UPR, all of which were accepted. In addition, Germany accepted 15 out of 18 recommendations related to racial discrimination, reflecting a formal acknowledgment of the importance of enhancing the legal and institutional framework to combat discrimination in all its forms. However, data reviewed by Maat indicate that significant challenges persist in the practical application of these commitments.

According to reports reviewed by Maat, the Federal Anti-Discrimination Agency received approximately 11,405 discrimination complaints in 2024, the highest number recorded since the agency's establishment and representing a 6% increase compared to the previous year. Racial

[1] Universal Periodic Review – Germany, OHCHR, https://2cm.es/1oYti

discrimination complaints topped the list, accounting for 43%, followed by disability-related complaints at 27%, and gender-based discrimination at 24%. These figures highlight the expanding nature of this phenomenon and its various dimensions, confirming that discrimination remains a structural challenge extending beyond individual sectors to encompass multiple public areas.

Reports indicate that individuals currently do not enjoy adequate protection from discrimination in their dealings with government entities, including administrative offices, police departments, the judiciary, and public educational institutions. Approximately 25% of complaints filed in 2024 were related to incidents involving government bodies, reflecting a gap between the existing legislative framework and actual implementation in the public domain. Moreover, one in three complaints is related to labor market contexts, whether in job searches, interviews, the workplace environment, or during termination, demonstrating ongoing discrimination in employment and professional relations.[2] Reports specifically focus on gender-based discrimination in the labor market, where women face multiple adverse effects, including lower wages, reduced promotion opportunities, and instances of sexual harassment in the workplace. Muslim women and Black women are highlighted as among the most affected groups, with results indicating that over 60% of them experience recurring forms of discrimination in their daily lives, reflecting the intersection of religious, racial, and gender-related discrimination factors.[3]

Data also reveals clear forms of discrimination in housing, where Muslims and Black individuals reported being excluded from apartment viewings at significantly higher rates compared to others, with exclusion probabilities of 35% and 39% respectively, compared to only 11% for individuals not belonging to ethnic minorities. Field studies supported these findings by sending requests to actual apartment advertisements, changing only the names of the applicants while keeping income and education levels constant. The results showed that applicants with German-sounding names received 22% of the viewing invitations, compared to only 16% for applicants with names commonly associated with the Middle East, Turkey, or Africa. The study also confirms that individuals from racial and ethnic backgrounds face more precarious housing conditions, with 12% of them having fixed-term rental contracts compared to only 3% for non-ethnic minority

[2] Reports of racism and discrimination in Germany hit record high, The Local, https://2cm.es/1jVX-
[3] Racism in Germany is the norm not the exception, DW, https://2cm.es/1jVTD

individuals. Additionally, they bear a greater financial burden due to higher housing costs, with 37% spending more than 40% of their income on housing versus 30% for others.[4]

While some indicators suggest a potential narrowing of the wage gap in the future, including for individuals of African descent, discrimination in employment remains prevalent. Between 2023 and early 2025, applicants with African or Arabic names were the least likely to receive responses to their applications for vocational training programs, according to reports reviewed by Maat. This occurs despite the ongoing shortage of trainees in many German companies, reflecting existing barriers to achieving equal opportunities in the labor market.[5]

2. Ratification of International Human Rights Instruments

Germany received 19 recommendations concerning the ratification of key international human rights instruments, primarily focusing on the International Convention for the Protection of the Rights of All Migrant Workers and Members of Their Families. However, Germany did not accept these recommendations. This stance reflects the state's ongoing reservations about joining one of the most important international instruments dedicated to protecting the rights of migrant workers, despite the additional guarantees it could provide to complement the existing legal framework.

Maat notes that Germany has not yet ratified this convention, justifying its position by stating that the rights of migrant workers are already covered under other international agreements to which it has acceded. However, this justification does not negate the fact that non-joining deprives migrant workers of more specific protection that could address existing gaps in current frameworks, especially for the most vulnerable groups, such as workers without stable legal residency status.[6] Data indicates that migrant workers face multiple structural challenges due to this delay in ratification, as many from immigrant backgrounds work in unstable or low-paid jobs that do not sufficiently meet their families' needs, along with obstacles related to the recognition of educational and professional qualifications acquired in their home countries, limiting their opportunities for full integration into the labor market.[7]

These challenges are particularly evident in the situations of incoming nurses, as authorities require them to meet additional criteria related to academic qualifications and language skills, despite

[4] Germany's housing market 'contaminated' by widespread racism, DW, https://2cm.es/1jVVU
[5] Anti-immigration politics contribute to racism in Germany, Info Migrants, https://2cm.es/1oZO5
[6] Seventh periodic report submitted by Germany under articles 16 and 17 of the Covenant, due in 2023*, https://2h.ae/Tcqw
[7] Bildung und Arbeit müssen sich für alle gleichermaßen lohnen, Spiegel, https://2h.ae/aHaJ

having already obtained adequate academic credentials and vocational training in their home countries. Field testimonies have reported that some have faced neglect and racial discrimination within work environments, including unfair task distribution, wage gaps, and mistreatment by certain colleagues or superiors.[8] Estimates suggest that approximately 65% of Filipino nurses working in Germany have experienced some form of racial discrimination, alongside limited opportunities for adequate training or professional integration within work teams. Reports also document other discriminatory practices in the healthcare sector, including the perpetuation of stereotypes about Black patients being "less sensitive to pain," which negatively impacts the level of healthcare they receive and raises serious concerns about equitable access to health services without discrimination.[9]

3. Refugees, Migrants, and Asylum Seekers

Germany received 17 recommendations concerning the situation of refugees, migrants, and asylum seekers, all of which were accepted, reflecting a declared commitment to enhancing the protection of these groups and ensuring respect for their fundamental rights. However, recent developments reveal increasing challenges in this area, particularly regarding deportation policies and security conditions. Since 2022, deportation operations have significantly escalated, rising from fewer than 13,000 cases to over 20,000 deportations annually. In 2024, more than 20,000 individuals were deported, and this upward trend continued into 2025, with the Federal Ministry of the Interior reporting approximately 12,000 deportations in just the first half of the year. This expansion of deportation procedures raises human rights concerns regarding the consideration of humanitarian guarantees, especially in sensitive health cases. Reports indicate that the suspension of deportations for medical reasons remains limited and rare, including cases involving children who underwent major surgeries and were deported without completing required follow-up medical examinations.[10] Concurrently, there has been a troubling increase in attacks directed against asylum seekers and refugee accommodation centers, with a noticeable rise in crimes committed against them. According to official data, 77 assaults on asylum seekers and refugees were recorded in 2024, along with eight incidents of intentional damage to their homes. These assaults resulted in 34 individuals being hospitalized for treatment, including 16 women, 14 men, and two young girls, alongside two individuals whose ages were not specified. This situation reflects the ongoing

[8] Rassismus im Gesundheitswesen (1/2) – Diskriminierung von Ärzten und Pflegekräften, https://2h.ae/kGhf
[9] Rassismus und Diskriminierung im Gesundheitssystem keine Seltenheit, aerzteblatt.de, https://2h.ae/tagD
[10] Germany: Deportations are on the rise, DW, https://2cm.es/1jVFu

security risks that threaten the safety of these groups despite the state accepting related recommendations for their protection.[11]

4. The Right to Work

Germany received eight recommendations concerning the right to work, all of which were accepted, indicating a formal commitment to enhance the legal and regulatory framework governing labor relations and ensuring fair working conditions. Recent years have seen a number of legislative and institutional developments aimed at combating violations associated with the labor market, particularly undeclared work and illegal employment. On August 6, 2025, the Federal Cabinet approved a comprehensive draft law targeting a stricter crackdown on undeclared work by expanding the powers of the Financial Control of Undeclared Work Unit (FKS) overseeing undeclared work, implementing digital risk analysis tools, and strengthening compliance requirements in high-risk sectors. These reforms represent an important step toward modernizing enforcement mechanisms, particularly in light of the growing organized forms of illegal employment, and they directly affect companies employing foreign workers, as the legal consequences of non-compliance have become more stringent for both employers and employees. The reform grants law enforcement authorities expanded investigative powers, including monitoring communications in serious cases involving suspected invoice fraud or the use of fake subcontractor chains, typically requiring judicial authorization within tightened controls. Additionally, authorities will rely on artificial intelligence and automated data analytics to detect suspicious patterns and improve risk assessment-based inspections. Certain sectors, such as hairdressing, beauty salons, and personal care services, will be subjected to stricter oversight, requiring workers to present valid identification during inspections. The rules concerning data retention have also been expanded, with banks and insurance companies now required to retain relevant records for up to ten years, facilitating the tracking of wage payments and financial structures linked to undeclared employment.[12]

In this context, Maat notes that Germany enacted the Supply Chains Act at the beginning of 2023, which obliges companies to conduct due diligence to ensure that their operations and supply chains are free from human rights violations, including child labor, low wages, and environmental harm.[13]

[11] Berlin reports rise in attacks on refugees amid surge in far-right crime, The Guardian, https://2cm.es/1oZDJ
[12] Germany intensifies enforcement against undeclared work, Vialto partners, https://2cm.es/1jVjE
[13] Mensch und Umwelt besser geschützt, Hundesregierung, https://2h.ae/iMYn

Starting in January 2024, the scope of this law was expanded to include companies employing 1,000 staff or more, after initially being limited to companies with 3,000 or more workers. This expansion comes in response to growing concerns raised by reports regarding some major German companies benefiting from the labor of hundreds of thousands of children in cocoa production chains in Ghana, with severe health and educational impacts on these children.[14]

Despite these positive steps, the year 2025 witnessed a rise in labor disputes due to pressures from international competition, economic slowdown, and increased operational costs. Reports from union leaders at major industrial companies such as Bosch, ThyssenKrupp, ZF Friedrichshafen, and Volkswagen, collectively representing over half a million workers, indicate that companies are increasingly inclined to reduce jobs, close certain factories, and relocate activities abroad. Unlike previous crises, management boards showed less willingness to make concessions, and in some cases, they unilaterally terminated wage agreements or suspended negotiations with employee representatives, according to multiple testimonies reviewed by Maat from workers, policymakers, executives, and economists in Germany.[15]

5. Violence Against Women

Germany received 14 recommendations related to combating violence against women, all of which were accepted, reflecting a declared commitment to enhancing criminal and institutional protections for women against various forms of violence. However, the existing legal framework still raises discussions about its adequacy in addressing the qualitative nature of gender-based violence. The German penal code is gender-neutral, criminalizing various acts such as physical assault, murder, and rape without explicit distinction based on the victim's gender, based on the principle of equality in treatment. While this approach promotes legal neutrality, it does not include a specific legal description that criminalizes violence against women as a distinct phenomenon with structural dimensions. Recently, there have been initial steps toward considering gender-related motives, as Paragraph 46 of the penal code allows for stricter penalties when a crime is committed for gender-specific reasons. However, the application of this provision remains limited to the penalty assessment phase and does not impact the foundational structure of criminalization or crime definition. Data from the Federal Ministry of the Interior reveal a clear gap in the exposure of men and women to domestic and sexual violence. Statistics indicate that women are

[14] One year of Germany's Supply Chain Act — some progress made, DW, https://2h.ae/cXzu
[15] Germany faces year of industrial strife as companies go into battle with workers, Reuters, https://2cm.es/1oZeA

significantly more susceptible to domestic violence and are victims of sexual crimes at a rate nearly six times that of men, also representing more than half of digital violence victims. These indicators reflect the unequal nature of gender-based violence, despite the formal neutrality of legal texts.[16]

Reports indicate that someone becomes a victim of domestic violence in Germany every two minutes, with experts suggesting that the actual numbers may be much higher due to the prevalence of unreported cases. Women remain the most affected group, comprising approximately 80% of domestic violence victims. The year 2024 recorded a new historical high in the number of victims, with around 256,942 incidents, an increase of nearly 3.7% compared to 2023, reflecting the ongoing escalation of the phenomenon despite legislative and institutional efforts to combat it.[17]

Data also show that the majority of victims do not report crimes, with less than 10% of violence cases reported overall, and the percentage falling to below 5% in instances of domestic violence and sexual assault. This is attributed to various factors, including fear of retaliation, feelings of stigma and shame, and a lack of confidence in the effectiveness of legal measures, which limits the criminal system's capacity to detect these crimes early and hold perpetrators accountable.[18]

6. The Right to Education

Germany received 13 recommendations related to the right to education, accepting 10 and taking note of three others, reflecting an acknowledgment of the importance of developing more inclusive and equitable educational policies. However, challenges still hinder the full realization of the right to education, particularly regarding discrimination based on race or ethnic origin within the education system. Estimates reviewed by Maat indicate that children and youth from immigrant backgrounds face various forms of racial discrimination at different educational stages, either from some teachers or through interactions with peers in school and university environments. These practices contribute to lower academic achievement levels among these groups, adversely affecting their future opportunities for higher education and obtaining suitable professional qualifications,

[16] Interview: "Violence against women is a structural problem", Ludwig-Maximilians-Universität München, https://www.lmu.de/en/newsroom/news-overview/news/interview-violence-against-women-is-a-structural-problem-2af3094a.html
[17] Domestic violence in Germany has never been so high, new report shows, Euro News, https://2cm.es/1oYZa
[18] Nur fünf Prozent der Fälle häuslicher Gewalt werden angezeigt – Dobrindt und Prien stellen neue Dunkelfeldstudie vor, Deutschlandfunk, https://2cm.es/1oZ3F

which limits their potential to secure stable and decent jobs and increases the likelihood of experiencing social and economic vulnerability.[19]

Through its monitoring activities, Maat documented problematic content in some university curricula, especially in medical colleges, featuring racial stereotypes presented sometimes as "scientific facts." In this context, independent entities conducted interviews with doctors and students at German medical universities, along with analyzing several studies and visual materials included in textbooks. These analyses revealed concerning results regarding how certain racial and ethnic groups are represented in educational content. For instance, some curricula present stereotypes linking Black women to hypersexuality, leading to them being subjected to sexually transmitted infection screenings at higher rates compared to others. Conversely, Muslim women are depicted in some educational materials as sexually repressed, which might reduce healthcare providers' interest in offering sexual health advice and services to them. These educational messages reflect a pervasive influence of stereotypes within academic and professional training, raising questions about their implications for healthcare practices and the principle of equal access to medical services without discrimination.[20]

7. The Right to Social Security

Germany received two recommendations related to the right to social security, accepting one and taking note of the other, reflecting a degree of engagement with international efforts aimed at strengthening social protection networks. However, some reservations remain that may affect the actual level of protection provided to the most vulnerable groups. Maat has followed reports regarding the performance of the social security system and noted structural challenges related to achieving gender equality in benefiting from this system.

Data indicate that the social security system does not provide adequate protection for women against the risks of poverty, raising questions about the consistency of existing policies with the constitutional commitment to ensure a minimum standard of living for all individuals without discrimination. Statistics show that women are disproportionately affected by poverty, constituting about two-thirds of low-wage workers and, on average, receiving lower pension benefits than their male counterparts. This is partly linked to insufficient recognition of periods spent caring for

[19] Bildung und Arbeit müssen sich für alle gleichermaßen lohnen, Spiegel, https://2h.ae/aHaJ
[20] Rassismus und Diskriminierung im Gesundheitssystem keine Seltenheit, Deutsches Ärzteblatt, https://2h.ae/tagD

children in pension eligibility calculations. The situation is further complicated by the noticeable prevalence of single-mother households, deepening their economic vulnerability and increasing their reliance on social support systems. Rising living costs, driven by inflation and inadequate increases in social security allocations, have widened the existing economic gaps between genders, limiting the effectiveness of current measures in providing sufficient living protection. According to Article 1 of the German Basic Law, the state is committed to ensuring a minimum standard of living, a concept that extends beyond meeting basic material needs to include social and cultural resources that allow individuals to maintain their social relationships and participate in cultural and political life. Despite the government's 2021 declaration of its commitment to reform the social security system to address the economic repercussions of rising prices following the COVID-19 pandemic, these reforms have not matched the growing challenges. Furthermore, an aging population adds an additional layer of complexity, as projections indicate that elderly women may become more prone to poverty in the future, due to the anticipated decline in pension support and the ongoing gender wage gap. The current cost-of-living crisis, influenced by geopolitical tensions, further exacerbates economic pressures on vulnerable groups, particularly women.[21]

Maat recommends that the German government:

- Amend the legislative framework to combat discrimination to include effective protections in all government, security, judicial, and educational institutions.
- Consider expanding the powers of the Anti-Discrimination Agency and enhancing its human and financial resources to ensure a quick and effective response to complaints.
- Adopt a comprehensive national plan to combat racism and discrimination in the labor and housing markets, including clear monitoring mechanisms and punitive measures against employers and real estate agents involved in discriminatory practices, as well as requiring companies and institutions to implement written policies for equality and non-discrimination and train employees on them.
- Reassess the state's position on ratifying the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, and initiate a broad national

[21] Germany's Social Security System Fails to Protect Women's Rights, Shia Waves, https://2h.ae/AUsH

dialogue on ways to align national legislation with it, ensuring special protection for the most vulnerable groups among migrant workers.

- Implement practical measures to improve the conditions of refugees and asylum seekers by restricting deportation in sensitive humanitarian and medical cases and ensuring respect for the principle of non-refoulement, as well as enhancing security measures to protect shelters and reduce hate crimes against refugees.
- Strengthen the legal and institutional framework to combat violence against women by incorporating a specific definition of gender-based violence in the penal code, expanding protection services, and launching widespread awareness campaigns to encourage reporting and reduce stigma.
- Develop the social security system to better address gender gaps by improving recognition of child care periods in pension calculations, enhancing benefits for low-wage groups, and adopting measures targeting single-mother households to reduce their exposure to poverty.