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Formale Monitoring-Eingabe an GREVIO

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Berlin, 05. January 2026

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Subject:

Implementation of the Istanbul Convention in Germany –
Federal responsibility, recognition of co-victims after femicides, and institutional secondary victimisation

Dear Members of GREVIO,

Within the framework of monitoring the implementation of the Istanbul Convention in Germany, we wish to draw GREVIO's attention to a **structural implementation problem** concerning both the **recognition of co-victims following completed femicides** and the **attribution of responsibility between the federal level and the Länder**.

1. Subject of this submission

This submission addresses the **lack of systematic recognition and support for co-victims following femicides** and the resulting **institutional secondary victimisation** caused by a lack of recognition, lack of acceptance and discriminatory exclusion from victim protection systems. Co-victims – as family members of women killed through intentional violence – are, according to established victimological research, **co-victims and at the same time primary victims of the crime**, as their harm is directly caused by the killing itself.

2. Attribution of responsibility as an implementation problem

In exchanges with victims' organisations, the federal ministry responsible for the Istanbul Convention has stated that issues relating to the recognition and support of this victim group fall **exclusively within the competence of the Länder**.

This position gives rise to serious concern.

Germany, as a State Party to the Istanbul Convention, is **internationally responsible** for its full, effective and **non-discriminatory implementation**.

In this context, the federal level bears particular responsibility for:

- reporting to GREVIO,
- establishing the legal framework in key areas relevant to the Convention,
- national coordination of implementation, and
- ensuring equivalent minimum standards of victim protection throughout the country.

A general reference to federal structures must not result in a situation where a clearly identifiable and foreseeable victim group – namely co-victims following femicides – is **effectively excluded from access to protection, support and rehabilitation services**

3. Legal assessment in light of the Istanbul Convention

Such a shifting of responsibility increases the risk of **institutional secondary victimisation**, as:

- the victim status of co-victims is not recognised,
- the direct consequences of the crime for them are not accepted as relevant for protection, and
- they are denied equal access to victim protection and support structures.

This practice is **not compatible with the victim-centred and non-discriminatory approach of the Istanbul Convention**, in particular with **Article 4**.

4. Request to GREVIO

We therefore respectfully invite GREVIO to:

1. clarify that federal or decentralised competence arrangements do not absolve the State of its **overall responsibility** for implementing the Istanbul Convention;
2. urge the State Party, in particular Germany, to **explicitly recognise co-victims following completed femicides as a victim group**; and
3. ensure that this group has **equal access to protection, support and participation mechanisms**, in order to effectively prevent institutional secondary victimisation.

The German version of the monitoring letter from the Federal Association ANUAS e.V. is attached.

Yours sincerely,

Marion Waade
Chairwoman of the Federal Association ANUAS e.V.

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Mit freundlichen Grüßen



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