



David Kipp
March 2026

Working in Germany

Shaping Fair Recruitment – Preventing Exploitation

Imprint

Published by

Friedrich-Ebert-Stiftung e. V.
Godesberger Allee 149
53175 Bonn
Germany
info@fes.de

Issuing Department

Division for International Cooperation
Global and European Policy
<https://www.fes.de/referat-globale-und-europaeische-politik>

Responsibility for Content and Editing

Annette Schlicht | Policy Officer | Migration and Development

Contact

christiane.heun@fes.de

Translation

Philippa Carr (MA)

Design/Layout

pertext | corporate publishing
www.pertext.de

Cover picture

picture alliance / REUTERS | CHARLES PLATIAU

The views expressed in this publication are not necessarily those of the Friedrich-Ebert-Stiftung (FES). Commercial use of media published by the FES is not permitted without the written consent of the FES. Publications by the FES may not be used for electioneering purposes.

March 2026

© Friedrich-Ebert-Stiftung e. V.

ISBN 978-3-98628-846-4

Further publications of the Friedrich-Ebert-Stiftung can be found here:

➔ www.fes.de/publikationen

David Kipp
March 2026

Working in Germany

Shaping Fair Recruitment – Preventing Exploitation

Content

Executive Summary	3
1. Introduction	3
2. Unfair Recruitment Practices and the Risks of Labour Exploitation	4
3. Possible Actions for Fair Recruitment	5
3.1 Adapting the Legal Framework for Recruitment in Germany	5
3.2 Building on Cooperation with Countries of Origin	6
3.2.1 Within the European Union	6
3.2.2 Outside the European Union	7
3.3 Advancing International Processes for Fair Recruitment	7
4. Conclusion and Recommendations	8
List of abbreviations	10
Bibliography	12

Executive Summary

Germany is reliant on labour from third countries. However, many of those who are interested in immigrating to Germany are already confronted with misleading promises, high recruitment fees or insufficient information about their rights and working conditions in Germany in their country of origin. This increases the risk that labour migrants come to Germany with false ideas and debts, making them dependent on intermediaries or employers and therefore particularly vulnerable to labour exploitation.

The National Action Plan against Labour Exploitation and Forced Labour (NAP A/Z) adopted by the German Federal Government at the start of 2025, creates a political framework for tackling these structural problems in a preventative and holistic way. Among other things, it focuses on better information in the country of origin, clear checking mechanisms in the recruitment process and closer collaboration with partner countries. It is crucial, however, that the needs and protection interests of migrant workers are a priority at all times. This includes comprehensible contracts, protection against high or unauthorised fees and effective complaint mechanisms – both in Germany and in the country of origin.

This policy brief demonstrates how fair recruitment can be strengthened at national, bilateral and international level. It draws on discussions held at a symposium jointly organised by the Friedrich-Ebert-Stiftung and the Service Centre against Labour Exploitation, Forced Labour and Human Trafficking in Berlin in autumn 2025. This conference made it clear that better regulation of private intermediaries, realistic and partner-oriented cooperation with countries of origin and clear protection standards are decisive factors when it comes to preventing unfair recruitment practices and subsequent labour exploitation. Cooperation with trade unions, advice centres and diaspora organisations can significantly increase the effectiveness of these measures.

1. Introduction

Germany is reliant on labour from third countries. There are particular shortages in the medical and nursing professions, in social and IT professions, but also in seasonal jobs, construction, skilled trades and logistics (BA 2024). Even though immigration of international labour is currently declining due to the economic situation, labour market forecasts show that Germany will be dependent on additional labour migration in the long term in view of the baby boomer generation's retirement (Kurzawa 2025). Without immigration, the number of people in the labour force would decrease by around ten percent by 2040. Annual net immigration of at least 288,000 people is therefore needed in order to cover the expected demand (Kubis and Schneider 2024).

At the same time, net immigration from other EU states is dramatically decreasing due to similar demographic developments in these countries. According to the Federal Office for Migration and Refugees, net immigration fell by 67 percent year-on-year to 39,000 people in 2024 (BAMF 2025). Even the 2.6 million EU citizens employed and subject to social security contributions on the German labour market slightly declined for the first time in 2024, whereas the number of workers from third countries, including the Western Balkan states, increased (BAMF 2025: 3). In November 2025, there were over 3.3 million employees from third countries subject to social security contributions (BA 2025). Having said that, the majority of these people came to Germany for humanitarian reasons or as part of family reunification. Reforms to the Skilled Immigration Act in 2020 and 2023 are making themselves felt nonetheless, as the percentage of people who immigrate to Germany as economic migrants is steadily increasing (Heß 2025: 5).

The growing number of workers from third countries is encountering a labour market in which migrants are often precariously employed or even exploited. The proportion of foreign workers in the low-wage sector has increased from ten to 34 percent in the last 15 years, particularly in the building cleaning, food industry, construction and logistics sectors (Lübbe 2024, 2025).

In early 2025, the German Federal Government adopted a National Action Plan against Labour Exploitation and Forced Labour (NAP A/Z) in order to prevent exploitative working conditions. This aims to “strategically and sustainably prevent labour exploitation and forced labour, effectively combat these abuses and protect the victims” (BMAS 2024: 5). In this context, the NAP A/Z refers to the prevalence of exploitative conditions on the German labour market, which the German Federal Government should combat across all departments. Improving the conditions of recruiting labour from abroad is also defined as

an important field of action with the aim to ensuring fair standards.

In autumn 2025, the Friedrich-Ebert-Stiftung and the Service Centre against Labour Exploitation, Forced Labour and Human Trafficking organized an international symposium to discuss how to protect the rights of migrant workers along international recruitment chains and the role of trade unions in doing so. Representatives from politics, trade unions and civil society used examples of important countries of origin from within the EU (Bulgaria and Romania) and the African continent (Kenya and Tunisia) to advise on opportunities for action, which will be summarised and further developed below.

2. Unfair Recruitment Practices and the Risks of Labour Exploitation

The risk of labour exploitation already begins in the country of origin when workers fall victim to fraudulent recruitment practices. Most recently, the case of 200 young people from Vietnam caused a stir. They had come to Berlin for vocational training with the help of dubious private intermediaries in their home country, but no longer turned up to their vocational school after a short time. It is feared that they were forced into precarious, undeclared employment or even into prostitution (rbb24 2025). This example illustrates the connection between exploitative recruitment practices and the areas of forced labour and human trafficking.

According to an expert on human trafficking, modern slavery and migration in Vietnam, Mimi Vu, the actors responsible are an “international recruitment agency for exploitation” (rbb 24 2025). At the FES conference, she described these actors’ ability to quickly adapt as a major challenge for government countermeasures, which are often too slow and inconsistent. The example of Vietnam is no exception here, as unfair or even exploitative recruitment practices are on the increase along certain migration corridors to Germany and in certain sectors. Sectors especially susceptible to fraud are nursing, in particular 24-hour care, but also activities in construction and the gig economy as well as seasonal work. People who come to Germany in debt and with insufficient knowledge of German are at particular risk of being exploited.

The exact extent of the problem of labour exploitation in Germany is difficult to capture statistically. In 2024, violations in 41 judicial inquiries exceeded the threshold for criminal liability. At the same time, the Federal Criminal Police Office (BKA) speaks of a high number of unreported cases (BKA 2025). According to a study by the Hans-Böckler-Stiftung based on data from advice centres, there are estimated to be between 100,000 and 200,000 people affected each year (Böhme 2024: 73).

Besides the state recruitment efforts of the Federal Employment Agency (BA), a large proportion of workers come to Germany via private recruitment agencies. They play an ambivalent role: in addition to predominantly reputable providers, there are also players who lure migrant workers

The National Action Plan against Labour Exploitation and Forced Labour (NAP A/Z)

The NAP A/Z comprises four fields of action: labour recruitment; workers’ rights and their enforcement; working conditions, occupational health and safety and state control; as well as corporate responsibility. The German Federal Government thus fulfils international obligations arising from its ratification of the 2014 Protocol to ILO Convention No. 29 against Forced Labour (1930) as well as from Germany’s status as a Pathfinder Country under the UN Alliance 8.7. This global alliance initiated by the ILO has committed itself to achieving United Nations Sustainable Development Goal 8.7 on the complete abolition of child labour and the end of forced labour and human trafficking.

The NAP A/Z identifies three central tasks in the field of recruiting workers from abroad:

- (1) Potential workers should be informed about their rights and obligations in their country of origin by means of information services and legal education.*
- (2) Verification and control mechanisms in the recruitment process should be strengthened, in particular through better networking and awareness-raising among the bodies and actors involved.*
- (3) Germany’s bilateral cooperation with countries of origin, such as within the framework of migration agreements, should have a preventative effect and help to avoid exploitation. (BMAS 2024: 6f).*

with unrealistic or even deliberately misleading offers. People interested in migration are often contacted by private recruitment agencies via social media networks, making it difficult to distinguish fraudulent offers from those that are trustworthy. Depending on the country of origin, recruitment fees from 5,000 to 25,000 euros are charged. Workers are often forced to take on debt in order to raise these sums. In this way, they become even more dependent both on their intermediaries, who are also their creditors in some cases, and on their employers. As part of the FES conference, Arbeit und Leben Nordrhein-Westfalen reported on a social media project aimed at raising awareness among migrant workers from Romania about misleading job offers (Arbeit und Leben 2025). According to their experiences, fake profiles, inadequate contract details, excessive costs or illegal payments are widespread. Added to this is manipulation and abuse through unrealistic promises, data theft and the unauthorised use of official logos, as well as structural problems such as widespread disinformation.

In Ghana, too, non-state intermediaries very effectively used social media for fraudulent business models, as reported by Dr Kennedy Atong Achakoma from the Ghana Trades Union Congress. Though simply banning mediation by private actors is not expedient. After Ghana had banned the private recruitment of domestic employees to the Gulf States in 2018, Ghanaian workers found their way to the Gulf States via other ECOWAS states. This has increased the risk of exploitation to an even greater extent (Kandilige et al. 2022: 6f).

3. Possible Actions for Fair Recruitment

The NAP A/Z comprises 14 measures to strengthen fair recruitment. At the FES symposium, it became clear which aspects are particularly important for an effective and sustainable overall approach. This includes better legal framework conditions for the private recruitment of workers in Germany, more comprehensive cooperation with selected countries of origin within and outside the EU and stronger international engagement.

3.1 Adapting the Legal Framework for Recruitment in Germany

Private recruitment agencies are generally subject to poor regulation in Germany. In contrast to some other EU member states, there is neither a specific registration nor authorisation requirement. Only a business licence is required, which is usually issued without special conditions. It is true that German law in § 296 Book 3 of the German Social Code (SGB III) provides for individual normative requirements which set minimum standards for private recruit-

Fair Recruitment

Fair recruitment means that recruitment processes are transparent, free of charge, legally compliant and humane, and that labour migrants are protected at all stages of migration. Key requirements include that recruitment is free of charge for workers (employer pays principle); full transparency regarding the process and contact persons throughout; and written, clear and comprehensible communication of all key rights and obligations in a language that the worker understands. (ILO 2019)

ment activities, including the obligation to present a clear and comprehensible recruitment contract, transparency regarding the process and the limitation of fees to a maximum of 2,000 euros. According to § 296 Book 3 of the German Social Code (SGB III), there is also an explicit ban on fees for trainees. Yet, these regulations are strongly tailored towards the national context. What is more, although control and enforcement mechanisms exist in theory, these are not applied effectively. Thus, infringements of these standards often have no consequences in practice – especially not with regards to international recruitment activities.

Against this background, the mandate formulated in the NAP A/Z to “examine possible measures in the area of private recruitment agencies for ensuring fair recruitment from third countries” should be emphasised (BMAS 2024: 17). The need for improved regulation of private recruitment agencies was widely supported at the symposium.

Sven Meyer, Member of the Berlin House of Representatives (SPD parliamentary group):

»Recruitment must be considered from a human perspective – as opposed to a logic of the market. Robust rules are needed wherever a market emerges, otherwise exploitation is inevitable.«

Further discussions are needed about which form of regulation is the most promising. This could include – as in some other EU countries – the requirement to register as private recruitment agency. Other approaches, too, such as a bilateral cooperation requirement for private recruitment agencies from third countries with providers legally based in Germany, should be examined.

Beyond calls for stricter legal framework and controls, voluntary models for improving the situation were also discussed, including the “Fair Recruitment Care Germany” seal of quality. The 75 certified recruitment agencies

are committed to exempting care staff that they place from recruitment fees and providing them with comprehensive information, as well as ensuring that their recruitment takes place under socially acceptable and legally secure conditions. The instrument was initiated by the Federal Ministry of Health (BMG), whose representative Dr Roland Jopp not only considered the approach to be sensible for ethical reasons. It is also attractive for employers, as care staff recruited this way have an above-average retention rate of 90 percent in their companies. Certification is only possible for recruitment agencies based in Germany or the European Economic Area (EEA). Activities to date testify to the great potential of this approach; however, there is still a lack of permanent funding for the instrument. An expansion to other sectors would be conceivable, but would require far greater financial commitment – ideally also on the part of employers.

3.2 Building on Cooperation with Countries of Origin

As already mentioned, fraudulent recruitment practices and labour exploitation often begin in the country of origin and develop along the recruitment chains. A preventative approach thus calls for a closer look at these processes. The NAP A/Z emphasises the need for greater cooperation with the most important countries of origin. It should be noted that there are marked differences in the conditions between European Union member states, for whose nationals the free movement of workers applies, and non-European countries of origin, so-called third countries. The FES symposium focused on African countries of origin in particular.

3.2.1 Within the European Union

Romania and Bulgaria are among the most important countries of origin for EU internal migration to Germany. In October 2025, some 518,000 employees from Romania and around 179,000 from Bulgaria were working in Germany and subject to social security contributions (BA 2025). Both countries have specific laws governing the recruitment of their own nationals abroad. Bulgaria has a registration and control system that provides for regular inspections and while the activities of recruitment agencies in Bulgaria are subject to licensing, Romania provides for mandatory registration at the labour inspectorate, which also acts as a supervisory authority. This places strict requirements on private agencies regarding staff qualifications as well as information and verification obligations towards job seekers. The statutory regulations in Romania are thus stricter than in Bulgaria, however, the country is stretched to its limits when it comes to enforcement because informal inter-

mediaries are circumventing the rules. According to estimates by the German embassy in Romania, only around ten percent of the total number of workers placed (i.e. only 14,000 out of 140,000 people) came via official private agencies in 2024.

One fundamental problem is that in many cases the labour inspectorates only become active after grievances have occurred and are reliant on court decisions to impose sanctions. At the FES symposium, Denitsa Nikolova from the Bulgarian labour inspectorate emphasised that unfair recruitment practices would be countered at an earlier stage in cooperation with trade unions in Bulgaria, Germany and other EU countries. The effective cooperation with the Berlin Advisory Centre for Migration and Good Work (BEMA) serves as a role model here. Having said that, it cannot replace cooperation with German regulatory authorities, which is often inadequate, thus undermining Bulgarian attempts to avoid unfair recruitment.

There is also a regulatory gap in both Bulgaria and Romania with regard to labour migrants from third countries residing there. This group of workers, which is growing rapidly in both countries, has not yet received sufficient attention. Romania, for example, has an annual quota of 100,000 workers who can immigrate from third countries (mostly from South-east Asia) without major bureaucratic hurdles and then move on to other EU countries, for instance under the EU Posted Workers Directive (Assmus et al. 2024).

These examples illustrate the blind spots and inadequate regulation and control of the European labour market with regard to cross-border exploitative recruitment practices. It would therefore make sense for member states to better coordinate their protection mechanisms against unfair practices and also extend them to transnational recruitment agencies (Cremers 2025). Nevertheless, the EU's instruments and institutions in this area are considered to be ineffective. The European Labour Authority (ELA) that was only established in 2019, has had very limited powers so far; it is responsible for coordinating joint labour inspections by individual member states, for example. The European Commission has, however, announced a strengthening of the ELA (European Commission 2025). One of the recommendations from experts for better protecting against exploitative recruitment practices is the introduction of an EU-wide registration and licensing system for private employment agencies – including for those operating from outside the EU (Borelli 2024). In principle, a more intensive exchange between the member states on the respective regulatory approaches of private recruitment agencies would be desirable. The BMAS also signalled interest in this at the FES conference.

3.2.2 Outside the European Union

In the last legislative period, Germany systematically expanded its migration diplomacy and, for example, signed a comprehensive migration agreement with Kenya in September 2024, as its first African partner country. High expectations were placed on the migration agreement, as made clear by the misleading figure of 250,000 job opportunities in Germany repeatedly cited by Kenyan President Ruto (Hoffmann 2024). Like many other countries of origin, Kenya has a strong interest in providing its younger generation with job opportunities, which are lacking in their home country. While the migration agreement with Germany alone will not be able to solve this problem, as it does not grant Kenyans privileged access to the labour market, but merely enables them to use the immigration opportunities under the German Skilled Immigration Act. However, an added value of migration agreements – as in the case of the agreement with India – may lie in improving the conditions for shaping self-organised immigration (Kipp 2025).

In regard to Kenya, as Dr Merle Kreibaum (Federal Ministry for Economic Cooperation and Development, BMZ) explained at the symposium, this includes, for example, the organisation of a German-Kenyan job fair, a wider range of German courses by the Goethe-Institute and accelerated visa processing at the German embassy. From the perspective of Kenyan trade union representatives, measures for protecting migrant workers still need to be improved. At the FES symposium, they criticised the fact that trade unions had not been adequately informed and not sufficiently involved in the negotiation of the bilateral agreement. Having said that, their involvement in implementing and monitoring further cooperation is crucial in order to create fair conditions and prevent abuse.

Dr Mercy Nabwire Ouma from the Kenya Medical Practitioners Pharmacists Dentists Union said:

»Workers should not have to pay for labour. (...) No person should pay to be allowed to work. (...) Bilateral agreements that put economic and diplomatic interests before the interests of workers (...) degrade people to commodities.«

What is important is that clear and comprehensible contracts are available prior to leaving the country and that employees abroad have “a real voice and effective means of complaint”. Given that the countries of origin often lack the capacity to enforce standards for fair recruitment, it is largely up to the host countries to do so. Tying a work visa to an employer has proven to be highly problematic be-

Bilateral Migration Agreements

In recent years, Germany has concluded several bilateral migration agreements – including with India, Georgia, Moldova, Kenya, Uzbekistan and Colombia. These agreements create a structured framework for regular migration, simplify visa procedures and strengthen cooperation with countries of origin, such as in the areas of training, advice and recruitment. They thus offer an important instrument for promoting fair recruitment and improving the protection of migrant workers. In turn, better cooperation is expected from countries of origin when it comes to readmitting citizens who are obliged to leave the country. (Biehler, Kipp and Koch 2024)

cause this creates dependencies that could in turn favour exploitation. The Kenyan trade union expressed the need for closer cooperation with German trade unions. The recruitment agreement between Germany and the Philippines was cited as a model; it is accompanied by a monitoring committee that convenes once or twice a year, and in which German and Philippine trade unions are involved alongside government representatives.

It is also important to take a look at relevant countries of origin of labour with which no migration cooperation has been agreed. For example, because the conditions for cooperation have markedly deteriorated in recent years, as in the case of Tunisia. Here, private recruitment agencies, operating informally in many cases, recruit care workers to Germany in a largely unregulated manner (Belhaj 2025). The more stringent regulatory provisions for private intermediaries introduced by the Tunisian government are not being implemented. At the same time, social dialogue has come to a standstill due to the domestic political situation, making it difficult for trade unions to play an active role in migration cooperation. In the past, valuable experience was gained in cross-border cooperation between Tunisian trade unions and Italian and Spanish trade unions (FES 2017).

3.3 Advancing International Processes for Fair Recruitment

The issue of fair recruitment has long been a topic of discussion in forums on global migration policy processes. It was most recently enshrined in 2018 as Goal 6 of the UN Global Compact for Safe, Orderly and Regular Migration under the heading “facilitating fair and ethical recruitment and safeguarding conditions that ensure decent work”. Even though implementation of the Global Compact on Migration is not currently a priority in many

industrialised countries owing to widespread anti-immigrant sentiment and with the United Nations and its sub-organisations being under great pressure to make savings and reform, Germany should strive to strengthen international processes for fair recruitment. Such processes have the advantage that they can be more sustainable than bilateral approaches because their implementation and review are less dependent on the goodwill of the governments involved.

Yet, the IOM and the ILO pursue different approaches within the United Nations. The IOM relies on a legally non-binding, albeit broader, stakeholder approach in accordance with the principles for ethical recruitment established jointly with the International Organisation of Employers (IOE). The ILO, on the other hand, follows a tripartite approach to promote international standards for fair recruitment in dialogue between governments, employer's associations and trade unions, and has developed recommendations for bilateral agreements in the field of labour migration. Even though IOM and ILO essentially complement one another in their work through their mixed regulatory models and pursue different procedures to achieve similar objectives, it is more important than ever, against the backdrop of budget cuts, to create meaningful synergies between parallel processes.

One of the most important challenges is better regulation of private recruitment agencies, as they operate in a transnational business field. According to ILO estimates, they currently make a global annual profit of some 32 billion euros from unfair recruitment practices, 27 billion euros of which is attributable to withheld wages and five billion euros to recruitment fees (ILO 2024: 20). There are no definitive figures, however, the ILO estimates that around 28 million workers worldwide are affected by the phenomenon of extreme labour exploitation and forced labour (ILO 2022: 2).

To enforce standards for fair recruitment, the IOM introduced the International Recruitment Integrity System (IRIS) in the mid-2010s to certify private recruitment agencies that comply with fair standards. The advantage of this voluntary approach is that it is accessible to companies and private recruitment agencies. It is therefore hardly surprising that the "Fair Recruitment Care Germany" seal of approval is guided by the IRIS standards, and these could also be used in other comparable initiatives to strengthen fair recruitment processes. During the same period, the ILO initiated the "Fair Recruitment Initiative", which piloted new approaches and was reaffirmed in spring 2025 with the presentation of a new global strategy (ILO 2025). As an example of success in recent years, head of the ILO's Department of Labour Migration, Gladys

Cisnero, cited a joint initiative with a Qatari construction company that helped to reduce recruitment fees paid by Bangladeshi workers to obtain employment in Qatar from an average of 3,400 US Dollars to around 300 US Dollars.

The ILO continues to regard its Convention 181 on private employment agencies that was adopted in 1997 as an important reference (ILO 1997). However, Germany has not yet ratified the Convention. A main reason for this is that the Employer Pays Principle in Article 7 of the Convention is not compatible with the German legal situation, which allows a maximum recruitment fee of 2000 euros (BMAS 2017). By re-examining these legal hurdles to the ratification of ILO Convention 181, the German Federal Government could send a signal in favour of stronger regulation of private recruitment agencies.

4. Conclusion and Recommendations

The FES symposium has shown that the NAP A/Z adopted at the start of 2025 creates a new guiding framework for effective measures against unfair recruitment and labour exploitation. As the first comprehensive instrument in Germany for preventing exploitation along the entire recruitment chain, it provides a political framework that can bring together various state, economic, trade union and civil society actors from Germany in cooperation with the countries of origin.

The NAP A/Z contributes towards raising awareness about how recruitment to Germany is susceptible to unfair and exploitative practices. In addition to workers from Eastern European EU member states who have been immigrating for years, an increasing number of workers from third countries are also affected. There is an increased risk of people interested in migration falling victim to manipulative, non-transparent or fraudulent recruitment methods in their country of origin, which often has serious consequences for their subsequent working and living situation in Germany.

Against this backdrop, the new "Work-and-Stay-Agency for Skilled Immigration" planned by the German Federal Government should not only aim to simplify and digitalise migration management (BMAS 2025). It also opens up the opportunity to place greater focus on protection against unfair recruitment practices across all departments. To ensure that this protection perspective becomes systematically entrenched, the German Federal Government ought to take the following measures:

- Collecting information on services used by private recruitment agencies on the Work-and-Stay-Agency digital portal and developing voluntary certification-based approaches that contribute to the dissemination of standards for fair recruitment and highlight good practice;
- Reviewing legal measures for better control of private recruitment agencies, for example through the introduction of authorisation procedures in Germany or the requirement of bilateral cooperation, according to which recruitment agencies from third countries must prove that they have a partner in Germany;
- Supporting countries of origin in the development and implementation of their own regulatory mechanisms, for example through migration-related development cooperation and long-term institutional partnerships;
- Strengthening and diversifying information channels in the country of origin in order to specifically counteract misleading or fraudulent content on social media and to reach workers interested in migration at an early stage;
- Systematically involving civil society actors, diaspora representatives and trade unions in the sense of a whole of society approach – from planning joint measures to monitoring implementation.

What is more, labour market needs must be communicated more realistically to avoid exaggerated expectations that are often associated with migration agreements. Employers have a key role to play here; they should show greater willingness to fill open vacancies for which there are insufficient domestic applicants with foreign workers, while also considering integration measures from the outset. New digital formats – such as the skilled labour alliance planned by the Federal Ministry for Economic Cooperation and Development (BMZ) – can build bridges between business, politics and partner countries (BMZ 2025: 4).

At EU level, too, Germany should advocate additional measures to regulate and control the European labour market in connection with cross-border exploitative recruitment practices. There is also a greater need for action at the international level. In light of parallel instruments and mandates, the question arises as to how synergies can be created between the different approaches of the ILO and IOM in order to more effectively protect migrant workers from exploitation in global recruitment chains.

List of abbreviations

AHK	Chamber of Commerce Abroad
BA	Federal Employment Agency
BAMF	Federal Office for Migration and Refugees
BEMA	Advice Centre for Migration and Good Work (Berlin)
BKA	Federal Criminal Police Office
BMI	Federal Ministry of the Interior
BMAS	Federal Ministry of Labour and Social Affairs
BMG	Federal Ministry of Health
BMZ	Federal Ministry for Economic Cooperation and Development
ECOWAS	Economic Community of West African States
ELA	European Labour Authority
EU	European Union
EEA	European Economic Area
FES	Friedrich-Ebert-Stiftung
ILO	International Labour Organization
IOE	International Organisation of Employers
IOM	International Organization for Migration
IRIS	International Recruitment Integrity System
NAP A/Z	National Action Plan against Labour Exploitation and Forced Labour
SGB	Social Security Code
SPD	Social Democratic Party of Germany

Bibliography

Arbeit und Leben (2025): Arbeitsmigration fair begleiten. Available online at <https://www.arbeitundleben.nrw/kooperieren/projekte/arbeitsmigration-fair-begleiten/deutsch>, last updated on 06/11/2025, last checked on 06/11/2025.

Assmus, Josephine; Heindlmaier, Anita; Schmidt, Susanne K. (2024): Verbesserungen nur auf dem Papier? Die schwierige Kontrolle der Entsendung von Beschäftigten aus Drittstaaten. A&W blog. Available online at <https://www.awblog.at/Arbeit/Schwierige-Kontrolle-der-Entsendung-aus-Drittstaaten>, last checked on 25/11/2025.

Belhaj, Ali (2025): Fachkräftemigration zwischen Tunesien und Deutschland. Friedrich Ebert Stiftung (Policy Paper). Available online at <https://library.fes.de/pdf-files/bueros/tunesien/22093.pdf>, last checked on 12/11/2025.

BEMA (2025): Berliner Beratungszentrum für Migration und Gute Arbeit. Available online at <https://bema.berlin>, last updated on 07/11/2025, last checked on 07/11/2025.

Biehler, Nadine; Kipp, David; Koch, Anne (2025): The Potential of Bilateral Migration Agreements (SWP Comment, 47). Available online at <https://www.swp-berlin.org/en/publication/the-potential-of-bilateral-migration-agreements>, last checked on 10/11/2025.

Böhme, René (2024): Arbeitsausbeutung im Reinigungsgewerbe. Problemlagen, Hilfsstrukturen, Handlungsmöglichkeiten. Hans Böckler Stiftung; Arbeitnehmerkammer Berlin (Working Paper Forschungsförderung, 333). Available online at https://www.boeckler.de/fpdf/HBS-008862/p_fofoe_WP_333_2024.pdf, last checked on 22/12/2025.

Borelli, Silvia (2024): Labour intermediaries and labour migration in the EU. A framing puzzle to rule the market (and avoid the market of rules). Available online at <https://library.fes.de/pdf-files/bueros/bruessel/21726.pdf>, last checked on 07/11/2025.

Federal Employment Agency (2024): Fachkräftengpassanalyse. Available online at https://statistik.arbeitsagentur.de/SiteGlobals/Forms/Suche/Einzelheftsuche_Formular.html;jsessionid=BE4ED15B25FEAB119BA3EB13293BC899?nn=27096&topic_f=fachkraefte-engpassanalyse, last updated on 11/11/2025, last checked on 11/11/2025.

Federal Employment Agency (2025): Migrationsmonitor. Deutschland und Länder (Monatszahlen). Available online at https://statistik.arbeitsagentur.de/SiteGlobals/Forms/Suche/Einzelheftsuche_Formular.html?nn=1479694&topic_f=migrationsmonitor, last updated on 07/11/2025, last checked on 07/11/2025.

Federal Office for Migration and Refugees (2025): Freizügigkeitsmonitoring. Jahresbericht 2024. In collaboration with Johannes Weber. Nuremberg. Available online at https://www.bamf.de/SharedDocs/Anlagen/DE/Forschung/Berichtsreihen-MigrationIntegration/Freizuegigkeitsmonitoring/freizuegigkeitsmonitoring-jahresbericht-2024.pdf?__blob=publicationFile&v=14www.swp-berlin.org, last checked on 21/12/2025.

Federal Criminal Police Office (2025): Bundeslagebilder Menschenhandel. Bundeslagebild Menschenhandel und Ausbeutung 2024. Available online at <https://www.bka.de/SharedDocs/Downloads/DE/Publikationen/JahresberichteUndLagebilder/Menschenhandel/menschenhandelBundeslagebild2024.html?nn=27956>, last checked on 06/11/2025.

Federal Ministry of Labour and Social Affairs (BMAS) (2017): Öffentliche und Private Arbeitsvermittlung. Available online at <https://www.bmas.de/DE/Arbeit/Arbeitsfoerderung/Beratung-und-Vermittlung/arbeitsvermittlung-art.html>, last updated on 06/11/2025, last checked on 06/11/2025.

Federal Ministry of Labour and Social Affairs (BMAS) (2024): Nationaler Aktionsplan gegen Arbeitsausbeutung und Zwangsarbeit zur Umsetzung des Protokolls von 2014 zum ILO Übereinkommen Nr. 29 über Zwangsarbeit (1930). Available online at <https://www.bmas.de/DE/Service/Publikationen/Broschueren/a340-nationaler-aktionsplan-gegen-arbeitsausbeutung-und-zwangsarbeit.html>.

Federal Ministry of Labour and Social Affairs (BMAS) (10.11.2025): Mehr Fachkräfte mit der Work-and-Stay-Agentur gewinnen. Available online at <https://www.bmas.de/DE/Service/Presse/Meldungen/2025/mehr-fachkraefte-mit-der-work-and-stay-agentur-gewinnen.html>, last checked on 04/12/2025.

Federal Ministry for Economic Cooperation and Development (BMZ) (2025): Starke Partnerschaften für eine erfolgreiche Wirtschaft weltweit. Available online at <https://www.bmz.de/resource/blob/269838/aktionsplan-wirtschaft-entwicklung-20251002-ansicht.pdf>, last checked on 13/11/2025.

Cremers, Jan (2025): The international recruitment chain: Experiences and policy recommendations. In: European Journal of Industrial Relations, pp. 1–16. DOI: 10.1177/09596801251410706.

European Commission (2025): Report from the Commission to the European Parliament, the Council and the European Economic and Social Committee. Bewertung der Europäischen Arbeitsbehörde (ELA). COM (2025) 256 final. Brussels. Available online at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:52025DC0256>, last checked on 13/11/2025.

Friedrich-Ebert-Stiftung (ed.) (2017): More unity and solidarity: Two things we need for migration governance in Africa. Available online at <https://connect.fes.de/in-pipeline/more-unity-and-solidarity-two-things-we-need-for-migration-governance-in-africa.html>, last updated on 29/11/2017, last checked on 22/12/2025.

Heß, Barbara (2025): Monitoring zur Bildungs- und Erwerbsmigration: Erteilung von Aufenthaltstiteln an Drittstaatsangehörige. Jahresbericht 2024. Published by the Federal Office for Migration and Refugees (Berichtsreihe zu Migration und Integration, Series 1). Available online at https://www.bamf.de/SharedDocs/Anlagen/DE/Forschung/BerichtsreihenMigrationIntegration/MonitoringBildungsErwerbsmigration/mobemi-jahresbericht-2024.pdf?__blob=publicationFile&v=6, last checked on 10/11/2025.

Hoffmann, Heiner (2024): Arbeitsmigration aus Kenia: »Dann gehe ich eben woanders hin«. In: DER SPIEGEL, 30.09.2024, zuletzt geprüft am 10.11.2025. Available online at <https://www.spiegel.de/ausland/migration-warum-das-abkommen-mit-kenia-fachkraefte-abschreckt-a-e81ca5bd-d0b2-4165-9e33-ea2d8e682118>.

International Labour Organization (1997): Übereinkommen 181. Übereinkommen über private Arbeitsvermittler, 1997. Available online at https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@normes/documents/normativeinstrument/wcms_c181_de.htm.

International Labour Organization (2019): General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs. Available online at <https://www.ilo.org/publications/general-principles-and-operational-guidelines-fair-recruitment-and>, last checked on 27/11/2025.

International Labour Organization (2024): Profits and poverty. The economics of forced labour. Second edition. International Labour Organization. Geneva, Switzerland. Available online at https://www.ilo.org/sites/default/files/2024-10/Profits%20and%20poverty%20-%20The%20economics%20of%20forced%20labour_WEB_20241017.pdf, last checked on 11/11/2025.

International Labour Organization (2025): Fair Recruitment Initiative Strategy 2026-2030. The way forward, from policy to practice. Available online at <https://www.ilo.org/sites/default/files/2025-09/Fair%20Recruitment%20Initiative%20Strategy%202026-2030.pdf>, last checked on 12/11/2025.

International Labour Organization; International Organization for Migration; Walk Free (2022): Global Estimates of Modern Slavery. Forced Labour and Forced Marriage. Available online at https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@40ed_norm/@40ipec/documents/publication/wcms_854795.pdf, zuletzt geprüft am 22.12.2025.

Kandilige, Leander; Teye, Joseph; Vargas-Silva, Carlos; Godin, Marie (2022): Migration-relevant policies in Ghana. MIGNEX. Oslo (MIGNEX background paper). Available online at: <https://www.mignex.org/gha> last checked on 06/11/2025.

Kipp, David (2025): A Migration Miracle? Indian Migration to Germany (SWP Research Paper 2025/RP 04). Available online at <https://www.swp-berlin.org/publikation/a-migration-miracle-indian-migration-to-germany>, last checked on 06/11/2025.

Kubis, Alexander; Schneider, Lutz (2024): Zuwanderung und Arbeitsmarkt. Bertelsmann Stiftung. Available online at https://www.bertelsmann-stiftung.de/fileadmin/files/Projekte/Migration_fair_gestalten/Zuwanderung_und_Arbeitsmarkt_Kubis_Schneider_2024.pdf, last checked on 06/11/2025.

Kurzawa, Nicolas (2025): Einbruch der Arbeitsmigration: Ist Deutschland einfach zu unbeliebt? In: Frankfurter Allgemeine Zeitung, 17/11/2025. Available online at <https://www.faz.net/aktuell/wirtschaft/mehr-wirtschaft/einbruch-der-arbeitsmigration-ist-deutschland-einfach-zu-unbeliebt-accg-110781377.html>, last checked on 21/12/2025.

Lübbe, Sascha (2024): Ganz unten im System. Wie uns Arbeitsmigrant*innen den Wohlstand sichern. Special edition for the (German) Federal Agency for Civic Education. Bonn: (German) Federal Agency for Civic Education (publication series/(German) Federal Agency for Civic Education, Vol. 11165).

Lübbe, Sascha (2025): Ausländische Arbeitskräfte im deutschen Niedriglohnsektor. (German) Federal Agency for Civic Education. Available online at <https://www.bpb.de/themen/migration-integration/kurzdossiers/572576/auslaendische-arbeitskraefte-im-deutschen-niedriglohnsektor/>, last checked on 19/12/2025.

rbb24 (2025): Vietnamesische Azubis verschwinden aus Berliner Berufsschulen. In collaboration with Adrian Bartocha and Hannah Weber, 01/10/2025. Available online at <https://www.rbb24.de/politik/beitrag/2025/10/vietnam-azubis-berlin-sprach-zertifikate.html>, last checked on 28/12/2025.

SGB III (18.06.1997): Social Security Code. Reference: 860-3. In: German Civil Code. Available online at https://dejure.org/gesetze/SGB_III/296.html, last checked on 04/12/2025.

About the Author

David Kipp is a Senior Associate for the Global Issues Research Division at the German Institute for International and Security Affairs (SWP), where he is part of the development-oriented Strategic Refugee and Migration Policy project. He is a co-author of the SWP study [Germany is Looking for Foreign Labour](#) and has further explored labour recruitment in another SWP study [A Migration Miracle? Indian Migration to Germany](#).

Working in Germany



Germany will become even more dependent on labour from third countries in the medium and long term. This increases the demands on reliably managing labour migration, also in the interests of the workers concerned. Many people who are interested in migrating receive unclear or misleading information about working conditions, rights, and prospects in Germany in their country of origin. The risk of exploitative employment therefore often starts prior to entry into the country of destination.



Recruitment structures are often cross-border and informally organised – and thus difficult to monitor. There is a lack of reliable data, and official responsibilities are fragmented. At the same time, affected workers are reluctant to assert their rights owing to dependencies, lack of information, or language barriers. As a result, exploitation often remains invisible.



The National Action Plan against Labour Exploitation and Forced Labour adopted at the start of 2025, addresses precisely this issue. It aims to combat unfair recruitment practices through improved regulation and cooperation with countries of origin. Moreover, it is crucial to systematically involve trade unions, advice centres, and civil society actors in order to embed protection mechanisms, complaints channels and monitoring over the long term.

Further information on the topic can be found here:

➤ <https://www.fes.de/en/displacement-migration-integration>