

The Systems Map

A visual-style comparison of global consent systems
(Opt-in, Opt-out, and Mandatory Choice)

THE SYSTEMS MAP

1. OPT-IN SYSTEMS

(The default setting is “No donation” unless a person chooses to register)

Countries:

- Australia
- USA
- Germany
- Japan

Key Features:

- Individuals MUST actively register their decision.
- Family consent is always required.
- The system prioritises autonomy and explicit communication.

Strengths:

- Clear respect for individual choice.
- High levels of public trust in most countries.

Challenges:

- Many people support donation but forget to register.
- Families may not know the person’s wishes → lower consent rates.



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2. OPT-OUT SYSTEMS

(The default setting is “Yes” unless a person has opted out)

Countries:

- Spain
- UK (England, Wales, Scotland)
- France
- Portugal
- Argentina

Key Features:

- Everyone is considered a donor unless they have opted out.
- Families are still consulted in almost every country (except very few).
- Success depends heavily on the strength of the healthcare system.

Strengths:

- Reduces paperwork; makes donation feel “normal.”
- Can support higher donation rates when public trust is strong.

Challenges:

- Opt-out laws alone do not increase donation.
- Countries with low trust see no improvement.
- Families can still say no, making communication essential.



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MANDATORY CHOICE SYSTEMS

(Everyone must record a decision – no default)

Countries:

- USA – some states (e.g., New York driver's licence)
- Singapore (HOTA)
- Some European pilot systems

Key Features:

- Individuals **MUST** choose yes or no.
- No default position is assumed.
- Often tied to major ID renewals or licences.

Strengths:

- Ensures everyone's answer is recorded.
- Reduces uncertainty for families.

Challenges:

- Requires strong admin systems.
- Can pressure people to make a decision before they're ready.



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WHAT ACTUALLY MAKES A SYSTEM WORK?
(Teacher summary – all countries agree on these principles)

The 3 Critical Factors:

1. Family Conversations (Most decisive factor globally)
2. Public Trust in Healthcare (If trust is low, donation stays low)
3. Strong Hospital Infrastructure (Specialist teams, coordinators, ICU beds)

The key message for students:

“The system matters – but trust, communication, and support matter MORE.”

