

Guide Dogs: A Practical Guide

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- Ebenezer School & Home for the Visually Impaired
- Hong Kong Blind Union
- Hong Kong Federation of the Blind
- Hong Kong Guide Dogs Association
- Hong Kong Seeing Eye Dog Services
- The Hong Kong Society for the Blind

Reference Materials

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1. Introduction

According to the Census and Statistics Department (“C&SD”), there were around 47,600 persons with seeing difficulty in Hong Kong in 2020, which is equal to a prevalence rate of 0.6% among the total population. In the past five years, the EOC has received seven complaints from persons with visual impairments that they were discriminated against due to being accompanied by a guide dog and refused services or access to premises as well as during job recruitment process. Discrimination against the use of guide dogs by persons with disabilities (“PWDs”) without justification may be unlawful under the Disability Discrimination Ordinance (“DDO”) in Hong Kong, which prohibits both direct and indirect discrimination against PWDs on the ground of their disability. The EOC strongly believes that PWDs should enjoy equal rights to participate in society in public domains, such as equal access to premises and provision of goods, services and facilities. Companies that allow the entry and use of guide dogs can also demonstrate their corporate social responsibility and enhance their image.

2. What Are Guide Dogs?

2.1. Definition of Guide Dogs

Guide dogs are trained to perform tasks for persons with visual impairments. This can be seen as their “job” as they are individually trained to behave properly in public and faithfully follow directions from their users.

Aside from guide dogs, there are other types of dogs which receive dedicated training for providing services for other types of persons with disabilities (“PWDs”). They are collectively called “service dogs”. The following table introduces some examples of service dogs:

Type	User	Duty
Guide Dogs/ Seeing Eye Dogs	Persons with visual impairments	Assist users navigate safely and independently by avoiding obstacles, preventing falls, and alerting them to unusual situations on the road.
Hearing Dogs	Persons who are deaf or hard of hearing	Alert and respond to specific sounds, such as a knock on the door and an alarm.
Sensory Signal Dogs/ Social Signal Dogs	Persons with autism	Impede a child’s movement by utilising its body weight to slow down or prevent them from leaving home or moving to unknown areas. Alert and distract users to stop movements like hand flapping.
Seizure Response Dogs	Persons with a seizure disorder (including epilepsy)	Guard over users during a seizure, lie next to them to prevent injuries, go for help or activate a device by alerting a designated person of a seizure.

Table I. Examples of service dogs

2.2. Definitions or Legal Protection in Other Jurisdictions

Some jurisdictions have implemented laws and regulations that define and protect the use of service dogs, including guide dogs. For instance:

- In Mainland China, the Law on Building a Barrier-free Environment came into effect in September 2023, offering legal protection for PWDs using service dogs in specific public domains like hotels, cinemas, sports facilities, libraries, shopping malls, public transport and relevant transportation facilities.
- The Administrative Methods of Air Transport for Persons with Disabilities issued by the Civil Aviation Administration of China defines service dogs as “dogs specialised to provide assistance for persons with disabilities to live and work, including assistance dogs, hearing dogs and guide dogs”.
- Regulation 29 of the Environmental Public Health (Food Hygiene) Regulations of Singapore defines a guide dog as “a dog that is specially trained to aid a particular blind or visually impaired person”.

In Australia, the Disability Discrimination Act 1992 protects the rights of assistance dog users in access to public places, accommodation, education, employment and goods, service and facilities. Other common law jurisdictions, such as Canada, New Zealand, the United Kingdom and the United States, provide protection in similar public domains through their anti-discrimination legislation.

2.3. Situation in Hong Kong

As of April 2024, there are over 50 trained guide dogs in service in Hong Kong, while the International Guide Dog Federation recommends one guide dog for every 100 persons with visual impairments.

Currently, there is a limited extent of legal protection for PWDs’ use of guide dogs in some designated public domains, such as access to food premises (protected by the Food Business Regulation (Cap. 132X)) and boarding of the MTR, franchised buses and the Peak Tram (protected by relevant legislation). However, there is no such legal protection in other public domains, such as education and employment.

3. How to Identify Guide Dogs?

In Hong Kong, it is easy to distinguish guide dogs. The trained guide dogs provided by two local non-governmental organisations are equipped with harness for identification, whereas the guide dog puppies and guide dogs-in-training wear jacket and/or vest. There are also documents available for identification if in doubt.



Figure 1. Harness
(Photo by Hong Kong Guide Dogs Association)



Figure 2. Harness
(Photo by Hong Kong Seeing Eye Dog Services)



Figure 3. Vest
(Photo by Hong Kong Guide Dogs Association)



Figure 4. Vest
(Photo by Hong Kong Seeing Eye Dog Services)

 <p>香港導盲犬協會 Hong Kong Guide Dogs Association</p> <p>SAMPLE and qualified as Guide Dog User with Guide Dog XXXXXX on 8 July 2020</p> <p>21 Sep 2023 Date Issued</p> <p><i>Smile</i></p> <p>Chairperson (Service Development & Support Committee) Management Board Member</p>	<p>Guide Dog Name : XXXXXX 導盲犬名字 : XXXXXX AVID : XXXXXX GDA No. : XXXXXX DOB : 5 Nov 2017 Breed/品種 : Labrador /拉布拉多 Gender/性別 : Male/男 Color/顏色 : Black/黑色</p> <p>Guide Dog Qualification Date/ 8 August 2019 導盲犬畢業日期:</p> <p> </p> <p>*If found this card, please contact us. *如有拾獲此卡，請聯絡本會。 Tel: XXXXXX</p>
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Figure 5. Identification Document of Guide Dog Users
(Photo by Hong Kong Guide Dogs Association)

 <p>導盲犬 Seeing Eye Dog</p> <p>Name : XXXXXX Chip # : XXXXXX Owner : XXXXXX Phone : (852) XXXXXX</p> 	<p>香港導盲犬服務中心 Hong Kong Seeing Eye Dog Services</p> <p>Particulars of Dog</p> <p>Name : XXXXXX Breed : Labrador Retriever Sex : Male Colour : Black Date of Birth : 05/Jun/2021</p>
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Figure 6. Identification Document of Seeing Eye Dogs
(Photo by Hong Kong Seeing Eye Dog Services)



Figure 7. Identification Document of Puppy Raisers or Boarders
(Photo by Hong Kong Guide Dogs Association)



Figure 8. Identification Document of Puppy Walkers
(Photo by Hong Kong Seeing Eye Dog Services)



Figure 9. Identification Document of Guide Dog Trainers
(Photo by Hong Kong Seeing Eye Dog Services)



Figure 10. Identification Document of Guide Dog Trainers Issued by MTR Corporation
(Photo by Hong Kong Guide Dogs Association)

Besides visual identification, individual operators or managers can ask questions tactfully, when in doubt, to clarify whether the dog is a guide dog and its trained task(s) in assisting persons with visual impairments. However, we may wish to avoid unnecessary inquiries about a person's disability or asking for demonstration of trained tasks by the guide dog.

4. Right to Accessibility

4.1. United Nations Convention on the Rights of Persons with Disabilities

According to Articles 9 and 20 of the United Nations Convention on the Rights of Persons with Disabilities (“CRPD”), which focus on accessibility and personal mobility respectively, States Parties shall take effective measures to facilitate access by persons with disabilities (“PWDs”) to live assistance like use of guide dogs, in order to foster the independence and full participation of PWDs in all aspects of life. States Parties should also ensure that appropriate training be provided to stakeholders and staff working with PWDs in relation to the matter.

4.2. Disability Discrimination Ordinance in Hong Kong

The Disability Discrimination Ordinance (“DDO”) offers protection to persons with different forms of disability, including visual impairments, hearing difficulties, autism and epilepsy, etc. The DDO prohibits both direct and indirect discrimination against PWDs in applicable fields such as access to and management of premises, goods, services and facilities, and employment, etc.

- Direct discrimination occurs when, on the ground of disability, a PWD (e.g. a person with visual impairment) is treated less favourably than another person without a disability in similar circumstances.
- Indirect discrimination involves applying a seemingly neutral condition or requirement on everyone (e.g. a blanket ban on bringing animals into a premise), but such condition or requirement is disproportionately detrimental to PWDs (e.g. persons with visual impairments using guide dogs) and the application of such condition or requirement is not justified.

While there is currently no express provision in the DDO specifying that a refusal of the use of guide dogs is direct discrimination, a discrimination claim may still be lodged if a PWD is being indirectly discriminated against during the use of guide dog.

5. Interviews with Guide Dog Users

In October 2023, the EOC conducted one-on-one interviews with four guide dog users to solicit their views on using guide dogs in different public domains, and suggestions for improving support. The first-hand experiences of guide dog users may provide valuable insights to relevant stakeholders in Hong Kong, enabling them to better understand the daily challenges faced by the guide dog users. These stakeholders could thereby review their policies and practices to enhance support for guide dog users.

5.1. Personal Views on Guide Dogs

All interviewees expressed positive feedback on the functions of guide dogs. They became more independent than before and more confident about going out without bumping into people or accidentally knocking goods off the shelves when using their white cane.

- *“Guide dogs can improve our walking experience by helping us avoid contacting objects around us, and finding a wider enough path for us to pass through.”*
- *“Not only does my guide dog assist me in my daily life and mobility, but it also proves to be an exceptional companion.”*

All interviewees preferred bringing their guide dogs to less crowded places while avoiding crowded and dirty places.

- *“I would definitely avoid bringing my guide dog to places where the floor is extremely dirty, cluttered or wet.”*

5.2. Positive Encounters when Using Guide Dogs

All interviewees mentioned receiving support from their guide dogs in various public domains. The majority emphasised the significance of their guide dogs in public transport. An interviewee suggested that certain restaurants accommodated their guide dogs.

- *“My guide dog knows what to do when we go to Diamond Hill Station for train transfers. When we arrive at Diamond Hill Station, it follows the crowd and guides me to the correct platform for changing trains to urban areas.”*
- *“When restaurants notice my guide dog, they often arrange a more spacious seat, ensuring my guide dog’s comfort. However, these accommodations are typically limited to chain restaurants and restaurant groups.”*
- *“Having my guide dog with me makes things easier everywhere because waiters will assign me to a more convenient seat or a seat that does not cause any inconvenience or disturbance to others.”*

To facilitate the use of guide dog in the interviewees’ daily lives, one interviewee asked for support by getting colleagues’ understanding in the workplace.

- *“I enquired with the company if they would be open to having one of the non-governmental organisations providing guide dog services to give a briefing at the office so that all of our colleagues could learn how to interact with guide dogs. In the end, my supervisors attended the briefing.”*

5.3. Negative Encounters when Using Guide Dogs

Some interviewees encountered discrimination by service providers in some public domains. In particular, many of them were refused service or treated less favourably by taxi drivers by charging them with \$5 additional charge. An interviewee reported experiencing unwelcoming treatment at restaurants.

- *“I was once refused service by three New Territories taxi drivers at a railway station..... One driver said he was afraid of dogs; another claimed to be allergic to dogs. I was really angry at that time, but eventually, he admitted that he had no allergy towards dogs and reluctantly agreed to take us to our destination.”*
- *“Hailing a taxi is a thorny issue because I can’t reason with the drivers. It is common for taxis to refuse to stop when they see a guide dog.”*
- *“There are times when restaurants reject us by claiming falsely there are no seats available, assuming we won’t notice because of our visual impairment. The person I travelled with didn’t see anyone waiting, and no queue ticket was distributed or called.”*

An interviewee encountered unfriendly behaviour by passers-by when he/she brought his/her guide dog to public places. Although this kind of incident may be a standalone case, it reflects the misconception some members of the public have about the behaviour of guide dogs.

- *“I once encountered a slightly unpleasant situation where someone questioned why my guide dog wasn’t wearing a muzzle. I have also experienced a few instances in the park where a lady shouted at me, saying, ‘You can’t bring the guide dog here.’”*

5.4. Enhanced Support for Guide Dog Users

To support guide dog users in different public domains, some interviewees raised some tips and shared some practices implemented by their employers.

- *“It is crucial for us to carefully consider how we communicate the point about avoiding disturbances to guide dogs. We must ensure that the message does not discourage people from approaching and talking with individuals who are accompanied by guide dogs, as this could potentially lead to their social isolation.”*
- *“After I informed my supervisor, the company took the initiative to allocate a suitable area for my guide dog to rest whenever it accompanies me to the office. The company designated an area for me without me having to make a specific request.”*

An interviewee considered that guide dog puppies and guide dogs-in-training were equally important as working guide dogs because every guide dog had to go through socialisation and advanced training, which took place in public areas.

- *“I believe that guide dog puppies should be protected under the Disability Discrimination Ordinance (“DDO”) too. I have heard that puppy raisers often face rejection, such as being criticised or denied transportation. This is all because of the absence of legal protection.”*

6. Practical Tips for Stakeholders in Different Public Domains

6.1. Practical Tips for All Stakeholders

The EOC proposes the following practical tips for protecting the rights of guide dog users in public domains, for the reference of managers of premises, service providers and employers, etc.:

- ✓ Allow guide dog users and their guide dogs to enter facilities, premises, and transport vehicles.
- ✓ Post notices or stickers in conspicuous places to clearly indicate that guide dog users and their guide dogs are allowed for entry.
- ✓ Provide reasonable accommodations to guide dog users such as reserving sufficient space for the guide dogs to rest next to their users.
- ✓ Avoid imposing extra fees on guide dog users because they are accompanied by their guide dogs.
- ✓ Develop measures to prepare for potential conflicts between guide dog users and people who are allergic to dogs in shared spaces.
- ✓ Provide comprehensive training to staff, including frontline, back-office and contract workers, to raise their awareness of guide dogs, including how to interact with guide dog users and remind them of the organisation’s policy and acceptance of guide dogs.
- ✓ Under reasonably practicable circumstances, allow puppy raisers, boarders or trainers to bring their guide dog puppies or guide dogs in training into different facilities, premises and transport vehicles for training.

6.2. Practical Tips for Transport Sector

- **All types of public transport**

- ✓ Frontline staff should only communicate with guide dog users when providing assistance and should avoid interfering with or petting their guide dogs. Please refer to Appendix I for the etiquette of interacting with guide dogs and Appendix 2 for responsibilities of guide dog users.

- **Airline operators**

- ✓ Proactively alert passengers who have indicated to travel with guide dogs about destination regulations and the required documentation before departure.
- ✓ Avoid arranging guide dog users and their guide dogs in a row adjacent to an emergency exit.
- ✓ Accommodate large guide dogs on the cabin floor by the user’s feet, while smaller guide dogs could be placed on the user’s lap, which is suitably restrained with a harness attached to the user’s seat belt for safe take-off, landing and in turbulence.
- ✓ If the standard washroom is insufficient for both guide dog user and the guide dog, cabin crew may allow them to use the washroom with more space at premium class.

- **Train operators**

- ✓ Educate passengers to reserve space for guide dog users and encourage those sitting next to them to allow for more space for the guide dog.
- ✓ Ensure frontline staff at stations wear high-visibility jackets to help visually impaired customers distinguish them from others, especially in busy stations.
- ✓ Provide assistance to guide dog users when boarding the train by guiding them to the appropriate compartment (if needed).

- **Bus drivers**

- ✓ Park close to the curb and remind guide dog users of potential aisle obstacles.
- ✓ Ensure guide dog users and their guide dogs are seated before departure.
- ✓ Offer assistance to guide dog users, such as confirming their intended stops.

- **Minibus drivers**

- ✓ Under reasonably practicable circumstances, allow guide dog users and their guide dogs to get on the minibus.

- **Taxi drivers**

- ✓ Suggest guide dog users sit at the back.
- ✓ Suggest guide dog users keep their guide dogs in the footwell underneath them.
- ✓ Attend to the comfort of the guide dog users and their guide dogs before starting the journey, such as checking if the taxi's ventilation and temperature are suitable for them.

6.3. Practical Tips for Restaurants and Hotels

- ✓ Allow guide dog users to temporarily place their guide dogs under the dining tables until they have completed taking meals at self-service food lines, counters or buffet areas, if any.
- ✓ Avoid providing guide dog users with inferior services, such as denying them access to certain areas of a restaurant, cafe, or bar, or limiting them to an area where persons without disability are typically permitted.
- ✓ Allow guide dog users to reserve any available room in hotels, just like other hotel guests, without limiting them to rooms designated as "pet-friendly".

6.4. Practical Tips for Managers of Premises

- ✓ Handle any problems related to guide dogs in the same way as other non-disability issues. For example, if a manager of a premise receives a complaint about a guide dog's barking, he/she should handle it in the same way as handling a complaint about loud music.
- ✓ Ask disability-related information only as needed to ascertain the accommodation needs of people accompanied by guide dogs.
- ✓ Avoid sharing personal information related to guide dog users' disabilities with other residents or occupiers.
- ✓ Enhance training for frontline staff (e.g. security guards) to increase their awareness and acceptance of guide dogs.

6.5. Practical Tips for Employers

- ✓ Create a barrier-free accessible path of travel.
- ✓ Consult guide dog users on the location of their seats with a view to facilitating their movement. With mutual agreement and consent, employers may assign guide dog users to seats that are convenient, away from areas with high traffic and/or noisy.
- ✓ Allow guide dog users, whether they are job applicants or employees, to bring their guide dogs to the workplaces to see how best to provide accommodation to them.
- ✓ Adjust work schedules of guide dog users to include short breaks to care for the guide dogs' basic daily needs, such as taking the guide dogs outside for a break.
- ✓ Designate a space for the guide dog and its bed. The resting area is advised to be located in a draught-free space and positioned near its user's desk or workbench.

7. Appendices

Appendix 1: Etiquette of Interacting with Guide Dogs

Multiple local non-governmental organisations have been promoting a set of etiquette, namely "Three Don'ts and One Do", to assist your interaction with guide dogs in daily life.

Don'ts	
× Don't Reject	Do not reject but accept that guide dogs can have free access to public places, private/public estates and public transport.
× Don't Disturb/ Pet	<ul style="list-style-type: none">• Do not touch, pet or annoy a working guide dog without the consent of the user.• Do not catch the attention of a guide dog by making noises or gestures.
× Don't Feed	Do not feed or coax a guide dog.
Do	
✓ Do Enquire	Do enquire if your help is needed whenever you find a person with a guide dog lingering or hesitating in the streets. In addition, if you would like to touch or take a photo of the guide dog, do ask for the user's consent first.

Appendix 2: Responsibilities of Guide Dog Users

- **Taking all types of public transport**
 - ✓ Avoid feeding the guide dog fully right before travelling. The guide dog should be allowed to rest for at least one hour before travelling for health reasons.
- **Taking flights**
 - ✓ Notify the airline operator as soon as possible (at least 48 hours' notice in advance of departure) if the passenger needs to travel with a guide dog in the cabin.
 - ✓ Equip the guide dog with a travel restraining harness before boarding the flight.
 - ✓ When the flight is stable, guide dog user may remove the travel restraining harness and guide dog harness after the guide dog has settled.
- **Taking trains**
 - ✓ If necessary, inform the staff so that they could assist in navigating the station and boarding the train safely.

- ✓ Be aware of the surroundings and take precautions to avoid falling into the gap between the train and the platform.
- **Taking buses**
 - ✓ Keep an appropriate distance from the curb during the wait for buses.
 - ✓ Ensure the guide dog stays between the guide dog user's legs to prevent it from sliding down the aisle or falling down steps near doorways during an emergency stop.
 - ✓ Ensure that the body and tail of the guide dog are not exposed in the aisle to protect it from being stepped by other passengers.
- **Taking taxis**
 - ✓ Ensure that the guide dog is kept safe and secure in the vehicle. It can be secured on the back seat using a car harness that is attached to a rear safety belt.
 - ✓ Avoid placing the guide dog on seats unless the interior space does not allow it to sit down on the floor.
- **Entry into or exit from Hong Kong**
 - ✓ Bring along a proof that the guide dog has been trained by a recognised body, a recent letter written from a medical doctor illustrating why the person is required to travel with the guide dog, a Special Permit and related documents issued by the Agriculture, Fisheries and Conservation Department ("AFCD").
 - ✓ Reserve sufficient time for obtaining approval from AFCD which includes the application of a Special Permit, which exempts the guide dog from quarantine when it comes back to Hong Kong, and an in-cabin exemption letter for it, if taking flights.
 - ✓ Ensure that the guide dog complies with the relevant regulations of the destination, such as vaccination and quarantine period.
- **In residential or commercial premises**
 - ✓ Communicate with the property management company about the guide dog and any necessary accommodations.
 - ✓ Train and socialise the guide dog so that it does not pose a threat to the safety of others, such as ensuring that the guide dog is housetrained and not disruptive to the property.
 - ✓ Train the guide dog to avoid producing noise disturbances that go beyond the ordinary background noise.
- **In workplaces**
 - ✓ Notify employer before bringing the guide dog to the workplace unless the employer's policy explicitly permits guide dogs in the workplace. This would facilitate the employer to prepare for suitable accommodations.
 - ✓ Take part in educating other colleagues on how to deal with the guide dog.
 - ✓ Ensure that the guide dog has access to clean and fresh water at all times, which should be provided in a suitable bowl that is easy to clean in case of spillages.
 - ✓ Bring in a portion of the daily food and toys to help the guide dog settle.