



**Department of  
Early Education and Care**  
THE COMMONWEALTH OF MASSACHUSETTS

**Small Group, Large Group and School Age Child Care Licensing**

**POLICY STATEMENT: Entrapments**

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6.06 CMR 7.07(13) Safety Requirements for Equipment, Materials and Furnishings

*d. All play equipment, fences and structures must be free of entrapment hazards*

Each year there are reported cases of accidental asphyxiation deaths related to entrapment hazards. While playgrounds contribute to those numbers, head entrapments have also been found inside child care programs. Understanding what defines an entrapment and being able to recognize entrapment hazards within the program's environment is critical in preventing child injuries and in some cases, child deaths.

On average a young child has a body/torso size that is smaller than their head size with an average 5 year old having a head that measures 9 inches from the tip of the chin to the back of the head. Any opening that is greater than 3.5 inches but less than 9 inches may entrap a child's head. This means that a child may be able to enter an opening that allows their torso to pass through but may become entrapped when the size of the opening does not allow their head to pass through. A child may also place their heads through an opening and then turn their head into a position that does not allow the head to pass back out through the opening. Typically young children do not have the ability to problem solve when placed in a hazardous situation such as being trapped in a piece of equipment. In both cases, the opening is considered to be an entrapment and even when a child's feet are touching the ground, the child is at risk for serious injury or death.

Each program's environment should be assessed to determine if any of the equipment, furnishings or structures have entrapment areas that create a danger for the children using them. Measuring openings to determine if they fall within the entrapment criteria of an opening that is greater than 3.5 inches but less than 9 inches is an important step in identifying equipment that may not be safe.