MOHAWK NATION
OF GRAND RIVER
SECRETARIAT

BOOK XIII OF THE REGISTER'S BOOKS

Records, Privacy and Access

How the Nation keeps information about its people: its principles, who may see what, asking for records, keeping and disposing of them, and breaches — measured against the world's benchmarks, with an expert's questions answered.

One of the National Books of the Mohawk Nation of Grand River.

First edition · October 2026

Records, Privacy and Access

Book XIII of the Register’s books

Edition	First edition, October 2026
Mohawk Publication Number (MPN)	_____ — entered when the Register issues it
Published by	The Mohawk Nation of Grand River Secretariat · Grand River Territory, Ohsweken
To cite it	Records, Privacy and Access, Mohawk Nation of Grand River Secretariat, 2026, and its MPN
Copyright	© Mohawk’s Printer for Grand River, 2026, for the Mohawk Nation of Grand River. Reproduction as the Nation’s law allows (Book XXXI)
Version and date	1.0 — 26 October 2026
Status	For publication
Classification	Public
Approved by	The Secretary-General, on publication; the approval entered in the Gazette
Changes	First edition. Each later change is listed here, with its version, date and Gazette entry
A genuine copy	Its SHA-256 fingerprint is listed in the Catalogue of the Register’s books, and on the Nation’s Ledger. A copy whose fingerprint differs is not the published edition
Written	In plain language, to ISO 24495-1. Generated from the Register’s own definitions, so it says what the Register does

CONTENTS

Contents

The principles 5

Who may see what 7

A worked example 8

Asking for records 9

Keeping and disposing 11

When information gets out 12

How we compare 13

How we compare 14

The standards 14

Questions an expert or critic would ask 14

SECTION 1

The principles

How the Nation treats the information it holds about its people.

For every officer, and every resident.

Its colour: **Cover ink**

PRINCIPLES

Principle	In practice
Only what is needed	Each form asks only what its purpose needs; share links prove one fact, not a whole record
For its purpose	Information gathered for one purpose is not used for another without a lawful reason
Accurate	Residents can see and correct what is held about them; a correction never erases, it stands beside
Safe	Records are seen only by those whose work needs them; every opening of a case file is logged
Open	The Nation publishes how it handles information — in this book
Yours to see	Every resident can ask what is held about them, and be answered
Answerable	The Inspection Division audits access; breaches are reported within 24 hours, those affected told within 72

After the eight principles of the OECD Privacy Guidelines (2013).

SECTION 2

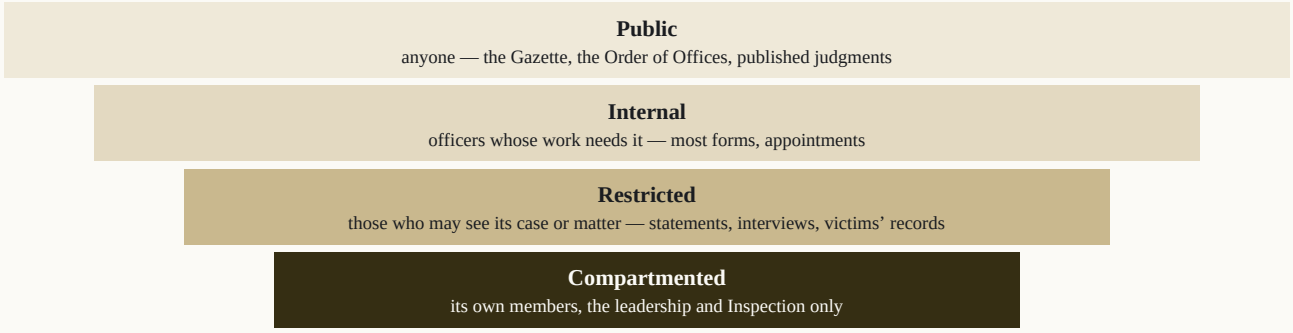
Who may see what

The classes of record, and need-to-know.

Its colour: **Cover ink**

CLASSES

How to read the chart: each band is a class of record, from the widest audience to the narrowest — Public, Internal, Restricted and Compartmented. Beside each is who may see it.



A worked example

Ivy INVESTIGATOR's case on the copper thefts is restricted. Sam SUPERVISOR, in the same division, sees it; Cy CYBER, a supervisor in another division, does not — the Register refuses him, saying the file is seen on a need-to-know basis. Every opening is logged; Ina INSPECTOR, in the Inspection Division, sees the log, and her own openings are in it too.

SECTION 3

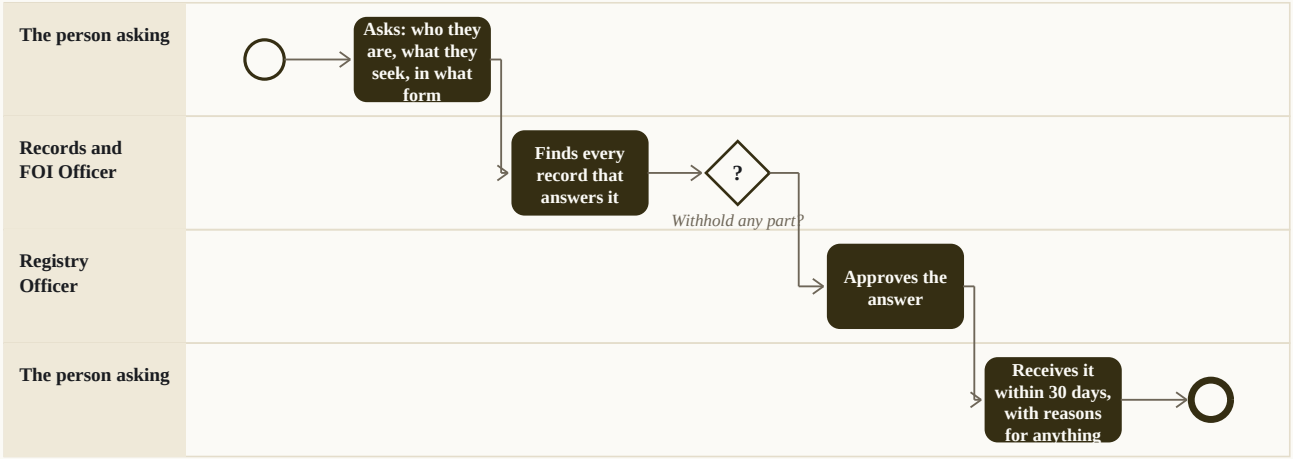
Asking for records

How a request for records is answered.

Its colour: **Cover ink**

ACCESS

How to read the diagram: each row is one party — The person asking, Records and FOI Officer, Registry Officer and The person asking. Follow the steps left to right, from the start to the end. A diamond marks a decision — Withhold any part? — and the path that follows each answer.



Something may be withheld only if it would	For example
Reveal another person’s private information	Another party’s address in a statement
Harm an investigation still open	The plan of a search not yet made
Endanger someone	A victim’s new address
Breach legal privilege	The Attorney General’s advice to an office

RULE Withhold only the part that must be withheld — never the whole record for the sake of a part — and say what was withheld, and why.

SECTION 4

Keeping and disposing

How long each kind of record is kept.

Proposed: for the Nation to adopt by its Gazette.

Its colour: **Cover ink**

RETENTION

Family	Kept
RGF001	Permanently (vital events, names and adoptions); other Registry forms 10 years
LDF001	Permanently
CRF001	Orders and judgments permanently; other filings 25 years after the matter closes
SCF001	Joining and leaving: 7 years after the officer leaves; breaches, holds and disposals: permanently
RPT001	Use of force and custody: 25 years; other forms: 10 years after the case closes
CAS001	Referred cases: 75 years; others: 10 years after closing
EVI001	Until the matter and any appeal are finished; then returned or destroyed, with a certificate of disposal
MAT001	Permanently
TGF001	Financial and customer records: at least 7 years after the account closes; budgets and reconciliations permanently
BKA001	At least 7 years after the account closes
BTX001	At least 7 years; the daily Merkle roots permanently, on the Ledger
LON001	At least 7 years after the loan is repaid
AMC001	At least 5 years after the case closes (FATF Recommendation 11)
STR001	At least 5 years (FATF Recommendation 11)
RSV001	Permanently

	Step
1	A record’s time runs from the event its family names (a case closing, an account closing, an officer leaving)
2	A legal hold stops any record being destroyed while a matter needs it
3	When its time has run and no hold applies, it may be destroyed: shredded, deleted or returned
4	Each disposal is witnessed, recorded on a certificate of disposal, and approved by the Secretary-General

When information gets out

	Step
1	Contain it at once: recall the email, lock the account, change the key
2	Tell the Secretary-General within 24 hours, with an information breach report
3	Tell those affected within 72 hours: what happened, what it means for them, what is being done
4	Record what will change, so it does not happen again

SECTION 5

How we compare

The benchmarks.

Its colour: **Cover ink**

BENCHMARKS

How we compare

Benchmark	What they do	What the Nation does
The OECD Privacy Guidelines (2013)	Eight principles of fair information handling, the basis of most privacy laws	Section 1: the same eight, in practice
The EU's GDPR	Breaches reported to the authority within 72 hours; rights of access and correction	Breaches to the Secretary-General within 24 hours and to those affected within 72; access within 30 days
Estonia's data tracker (X-Road)	Each citizen sees which official looked at their data, and when	Every opening of a case file is logged and audited; letting residents see their own log is the next step
Canada's Privacy Act	Access within 30 days; exemptions named in law	The same time, and the same kinds of exemption
ISO 15489	Records kept for their value, then disposed of with authority	A retention schedule, legal holds, witnessed disposal

The standards

Standard	For
OECD Privacy Guidelines (2013)	The principles
ISO/IEC 27001 and 27701	Information security, and privacy management
ISO/IEC 27035	Breaches
ISO 15489	Records management
ISO 24495-1	Plain language in every answer

Questions an expert or critic would ask

Who watches the officers?
The Register logs every opening of a case file; the Inspection Division, which answers to the Inspector General, audits it, and its own openings are logged too.

Can I see who has looked at my records?
Not yet. The logs exist; showing each resident their own, as Estonia does, is the next step, and should be adopted.

Where is the information kept?
On the Register's own host, with encrypted backups kept apart from it (Book XVII). The Nation should publish where its host is, and adopt encryption of the whole database at rest.

Is there an independent privacy authority?
Not yet. A Privacy Commissioner, independent of the Registrar General, to whom residents can complain, is proposed in Book VI's list of offices to consider.

The retention periods are only proposed.
Until the Gazette adopts them, nothing is destroyed: every record is kept.