HMRC - CG34893 - Settlor Trusts: Computations: Multiple Settlors

Section 79 provides that trust gains are only to be attributed to each settlor to the extent that those gains accrue on property originating from that person. Where the assets provided by two or more settlors are managed as separate funds, there should be no difficulty in determining to which settlor the gains on the disposal of particular items of property should be attributed. Where the assets provided by different settlors are not appropriated into separate funds, the legislation provides for a just apportionment as between the settlors.

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