

### INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

OMB APPROVAL

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Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934  
or Section 30(h) of the Investment Company Act of 1940

<b>1. Name and Address of Reporting Person*</b> <u>Crowley Michael F</u>  (Last) (First) (Middle) <u>WILLIS GROUP HOLDINGS LIMITED</u> <u>51 LIME STREET</u>  (Street) <u>LONDON X0 EC3M 7DQ</u>  (City) (State) (Zip)	<b>2. Date of Event Requiring Statement (Month/Day/Year)</b> <u>10/01/2008</u>	<b>3. Issuer Name and Ticker or Trading Symbol</b> <u>WILLIS GROUP HOLDINGS LTD [ WSH ]</u>  <b>4. Relationship of Reporting Person(s) to Issuer (Check all applicable)</b> Director 10% Owner <input checked="" type="checkbox"/> Officer (give title below) Other (specify below) <u>President, Willis HRH</u>	<b>5. If Amendment, Date of Original Filed (Month/Day/Year)</b>  <b>6. Individual or Joint/Group Filing (Check Applicable Line)</b> <input checked="" type="checkbox"/> Form filed by One Reporting Person Form filed by More than One Reporting Person
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#### Table I - Non-Derivative Securities Beneficially Owned

1. Title of Security (Instr. 4)	2. Amount of Securities Beneficially Owned (Instr. 4)	3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	4. Nature of Indirect Beneficial Ownership (Instr. 5)
<u>COMMON</u>	<u>7,945</u>	<u>D</u>	

#### Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

1. Title of Derivative Security (Instr. 4)	2. Date Exercisable and Expiration Date (Month/Day/Year)		3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)		4. Conversion or Exercise Price of Derivative Security	5. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Expiration Date	Title	Amount or Number of Shares			
<u>COMMON</u>	<u>10/01/2008<sup>(1)</sup></u>	<u>02/07/2012</u>	<u>COMMON</u>	<u>7,255</u>	<u>22.79</u>	<u>I</u>	<u>Right to acquire</u>
<u>COMMON</u>	<u>10/01/2008<sup>(1)</sup></u>	<u>02/16/2013</u>	<u>COMMON</u>	<u>34,824</u>	<u>27.12</u>	<u>I</u>	<u>Right to acquire</u>
<u>COMMON</u>	<u>10/01/2008<sup>(1)</sup></u>	<u>02/12/2014</u>	<u>COMMON</u>	<u>17,412</u>	<u>29.41</u>	<u>I</u>	<u>Right to acquire</u>
<u>COMMON</u>	<u>10/01/2008<sup>(1)</sup></u>	<u>02/11/2015</u>	<u>COMMON</u>	<u>17,412</u>	<u>22.43</u>	<u>I</u>	<u>Right to acquire</u>
<u>COMMON</u>	<u>10/01/2008<sup>(1)</sup></u>	<u>05/23/2015</u>	<u>COMMON</u>	<u>8,706</u>	<u>21.51</u>	<u>I</u>	<u>Right to acquire</u>

**Explanation of Responses:**

1. The Reporting Person was previously an Executive Officer of Hilb Rogal Hobbs (HRH). His interests in the Issuer's shares arise as a consequence of the completion of the acquisition of HRH by the Issuer on October 1, 2008, in which a combination of the Issuer's shares and cash were exchanged for HRH shares. The final number of Issuer shares allotted to the Reporting Person was not verified by the Exchange Agent until October 26th.

/s/ Shaun K. Bryant as  
attorney-in-fact for Michael      10/29/2008  
Crowley

\*\* Signature of Reporting Person      Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

\* If the form is filed by more than one reporting person, see Instruction 5 (b)(v).

\*\* Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.